



Naughton Power Plant

June 5, 2018

P.O. Box 191 * Kemmerer, Wyoming 83101

Cara Keslar, Monitoring Section Supervisor
Wyoming Dept. of Environmental Quality
Air Quality Division
200 West 17th Street
Cheyenne, WY 82002

RE: PacifiCorp – Naughton Plant – Kemmerer, WY: Request of Flag under the Exceptional Event Rule for PM-10 Exceedance – December 7, 2017

Dear Ms. Keslar:

In response to the letter dated May 15, 2018, attached is the requested chronological packet that will be posted to the Air Quality Division's website for the 30 day public comment period.

If you have any questions and/or need any additional information please contact Jason Murdock at (307) 828-4365

Sincerely,

Rodger Holt
Plant Managing Director

Murdock, Jason

From: Murdock, Jason
Sent: Friday, December 08, 2017 9:06 AM
To: Jon Walker (jon.walker@wyo.gov); 'Steven Mugg'
Cc: Shakespear, Brett; Holt, Rodger; Cara Keslar (cara.keslar@wyo.gov); Wiscomb, Thomas
Subject: Naughton Power Plant PM-10

Jon / Steve-

I am sending this email as an notification of a possible PM-10 exceedance that occurred at the Naughton Power Plant on 12/7/2017. The preliminary data indicates the PM-10 concentration was 302.5 ug/m3 for the 24 hour period. During yesterday's event we were experiencing high winds up to 40 miles per hour. As part of our fugitive dust plan's requirements, we stopped coal delivery and our equipment and a contractor's water truck were out watering various areas of the plant to mitigate the dust from the high winds and dry conditions we are currently experiencing. As part of this notification, we will be pursuing an exceptional event designation for this event.

If you have any questions feel free to give me a call.

Jason

Jason Murdock
Naughton Power Plant
Kemmerer, Wyoming
Phone: 307-828-4365
Fax: 307-877-2903

EXCEPTIONAL EVENT DEMONSTRATION FOR EXCESSIVE PARTICULATE CONCENTRATIONS MEASURED AT PACIFICORP NAUGHTON'S MONITORING STATION

Prepared for:

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P.O. Box 191
Highway 189 South
Kemmerer, Wyoming 83101

By

Meteorological Solutions Inc.
Project No. 174501.0001

February 2018



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EXECUTIVE SUMMARY

On December 7, 2017, ambient PM₁₀ concentrations measured at PacifiCorp Naughton's continuous ambient particulate monitoring station exceeded the 24-hour PM₁₀ National Ambient Air Quality Standard (NAAQS) and the Wyoming Ambient Air Quality Standard (WAAQS) of 150 µg/m³. There were no known breakdowns, operational events, or malfunctions at the Naughton Plant that would have led to PM₁₀ emissions from the plant to be excessively higher than normal. Therefore, the high PM₁₀ concentrations are believed to be caused by a natural high wind event.

The Naughton Power Plant has a fugitive dust compliance plan within the Plant Operations and Procedures Manual which provides procedures and guidelines for mitigating fugitive dust. Per the plan, dust suppressant chemical must be applied at least twice per year and three months apart as a preventative measure for fugitive dust emissions. Table 2-1 presents a tabulation of the chemical suppressant applications made in the second half of 2017. On December 18, 2017, the plant has started the process of hydro-seeding the ash ponds for dust control, dust prevention logs in Appendix A show that between December 18 and December 20, 2017, the South Ash Pond had received 109,800 gallons and 59,500 pounds and the North Ash Pond receiving of hydro-mulch.

The operations manual also requires a signal from the PM₁₀ monitoring station be provided to the control room for data and alarm purposes. The computer will initiate an alarm when the PM₁₀ value exceeds 150 µg/m³, based on an hourly average. Although the regulatory standard is based on a 24-hour average, the one-hour values trigger an alarm so that proper corrective action can be initiated in a timely manner so that PM₁₀ concentrations at the plant will not cause an exceedance of the 24-hour PM₁₀ NAAQS/WAAQS. Plant records show that site operators acted in accordance with plant policies and procedures to curtail operations and control emissions demonstrating that the event was both not reasonably controllable and not reasonably preventable.

An instrumented 50-meter meteorological tower which is located adjacent to a continuous particulate matter (PM₁₀) Met One Beta Attenuation Mass (BAM) monitor is operated at the Naughton Power Plant. Meteorological data are collected by a data acquisition system (DAS) that uses one-second data values to compute and store 5-minute and hourly averages of temperature, delta-temperature, horizontal wind speed (scalar), wind direction (unit vector), sigma theta of wind direction, vertical wind speed, solar radiation, net radiation, and precipitation. Windroses for the month of December and the date of the exceedance, December 7, show a contrast of the wind patterns observed throughout the month verses and on the day of the event. On December 7, 2017, the winds were predominantly out of the west-northwest with 8 hours (about 29 percent) having wind speeds greater than 10 mps (22.4 mph). In comparison, only 8.7 percent of wind speeds were greater than 10 mps during the month of December, making December 7 windier than normal.

Two PM₁₀ emission sources are located upwind of the monitoring shelter when the wind is out of the west-northwest. They are the north ash pond (NAP) and the mine. Site operator and water truck logs, as well as photographs taken on December 7 show that plant operations were curtailed and that dust suppressant activities on the ash pond aprons and roads were implemented throughout the day of the high wind event.

1.0 INTRODUCTION

The PacifiCorp Naughton Power Plant operates an instrumented 50-meter meteorological tower and a continuous particulate matter (PM₁₀) Met One Beta Attenuation Mass (BAM) monitor. On December 7, 2017, the ambient PM₁₀ concentrations measured at the Naughton Power Plant monitoring station showed an exceedance of the 24-hour PM₁₀ National Ambient Air Quality Standards (NAAQS) and the Wyoming Ambient Air Quality Standards (WAAQS) of 150 micrograms per cubic meter (µg/m³). Information presented in this report is intended to substantiate the PM₁₀ data collected on December 7, 2017 and the exceedance of the 24-hour PM₁₀ NAAQS/WAAQS was due to a natural event and as such, data should be flagged as an exceptional event.

1.1. Exceptional Event Rule

Air quality data may be flagged to be excluded from regulatory decisions due to the nature of the event being exceptional. The definition of an exceptional event is defined in 40 CFR Part 50.1(j) as *an event(s) and its resulting emissions that affect air quality in such a way that there exists a clear causal relationship between the specific event(s) and the monitored exceedance(s) or violation(s), is not reasonably controllable or preventable, is an event(s) caused by human activity that is unlikely to recur at a particular location or a natural event(s), and is determined by the Administrator in accordance with 40 CFR 50.14 to be an exceptional event. It does not include air pollution relating to source noncompliance. Stagnation of air masses and meteorological inversions do not directly cause pollutant emissions and are not exceptional events. Meteorological events involving high temperatures or lack of precipitation (i.e., severe, extreme or exceptional drought) also do not directly cause pollutant emissions and are not considered exceptional events. However, conditions involving high temperatures or lack of precipitation may promote occurrences of particular types of exceptional events, such as wildfires or high wind events, which do directly cause emissions.*

A narrative to justify data exclusion is defined in the exceptional events rule as found in 40 CFR 50.14 and includes:

- (A) A narrative conceptual model that describes the event(s) causing the exceedance or violation and a discussion of how emissions from the event(s) led to the exceedance or violation at the affected monitor(s);
- (B) A demonstration that the event affected air quality in such a way that there exists a clear causal relationship between the specific event and the monitored exceedance or violation;
- (C) Analyses comparing the claimed event-influenced concentration(s) to concentrations at the same monitoring site at other times to support the requirement at paragraph (c)(3)(iv)(B) of this section. The Administrator shall not require a State to prove a specific percentile point in the distribution of data;
- (D) A demonstration that the event was both not reasonably controllable and not reasonably preventable; and,
- (E) A demonstration that the event was a human activity that is unlikely to recur at a particular location or was a natural event.

2.0 EVENT SUMMARY AND CONCEPTUAL MODEL

PacifiCorp owns and operates the Naughton Power Plant which consists of one 156 net MW (nominal), one 201 net MW (nominal), and one 280 net MW (nominal) coal-fired electric generating units designated as Units 1, 2, and 3, respectively. Unit 1 went into commercial operation in 1963, Unit 2 in 1968, and Unit 3 in 1971. The Naughton Power Plant is an existing major stationary source of air emissions under both the New Source Review and Title V programs. Unit 1 has a maximum boiler heat input rate of 1,850 MMBtu/hour, Unit 2 has a maximum boiler heat input rate of 2,400 MMBtu/hour and Unit 3 has a maximum boiler heat input rate of 3,700 MMBtu/hour.

Particulate matter (PM₁₀) emissions from Units #1 and #2 are controlled by electrostatic precipitators (ESPs) and flue gas conditioning systems. PM₁₀ emissions from Unit #3 are controlled by a pulse jet fabric filter baghouse. Particulate emissions from coal and fly ash handling facilities are controlled by baghouse and/or chemical and water dust suppression systems. Fugitive emissions from coals stockpiles and unpaved trafficked areas around the plant are controlled with water and chemical dust suppressants.

On December 7, 2017, the 24-hour PM₁₀ concentration measured by the BAM at the Naughton monitoring station for the day was 360.8 µg/m³, which exceeds the 24-hour PM₁₀ NAAQS and WAAQS of 150 µg/m³. The following sections present the plant operations, air quality, and weather data for December 7, 2017.

2.1. Plant Operations

The Naughton Power Plant has a fugitive dust compliance plan within the Plant Operations and Procedures Manual which provides procedures and guidelines for mitigating fugitive dust. Per the plan, dust suppressant chemical must be applied at least twice per year and three months apart as a preventative measure for fugitive dust emissions. Table 2-1 presents a listing of the chemical suppressant applications by area and including the amount of chemical applied. Plant log entries, water truck logs, and email correspondence from plant personnel are provided in Appendix A, photographs of the dust suppressant activities are provided in Appendix B.

Two ponds, FGD ponds #1 and #2 are no longer active and are currently going through a close-out process that started in 2016. These ponds have been covered by soil and will undergo a seeding process in late 2018 or 2019 to finalize the retirement of the ponds. Chemical suppressant is applied to the soil to prevent and control windblown dust. On December 18, 2017, the plant has started the process of hydro-seeding the ash ponds for dust control, dust prevention logs in Appendix A show that between December 18 and December 20, 2017, the South Ash Pond had received 109,800 gallons and 59,500 pounds and the North Ash Pond receiving of hydro-mulch. Photographs of the hydro-mulch application are provided in Appendix B.

Table 2-1 Dust Chemical Suppressant Applications and Amounts

Area(s) Affected	Application Date(s)	Gallons of Chemical Suppressant Applied
SPDR, SAP, NPDR	06/07/2017	15,000
NPDR & NAP	06/08/2017	15,000
PLR	08/28-8/29/2017	33,000
FGD Pond 1	10/18/2017	6,000
FGD Pond 4 Road	10/19/2017	3,000
FGD Pond 2	10/19/2017	9,000
NAP, SAP, CP	10/31/2017	15,000
SAP	11/01/2017	3,000
SAP	11/01-11/02/2017	32,000
NAP	11/27/2017	40,000
FGD Pond 2	11/27-11/28/2017	40,000
FGD Pond 1	11/28-11/29/2017	24,000
SAP	12/07/2017	3,000
NAP	12/08/2017	12,000
NAP, NPDR	12/08/2017	15,000
SAP	12/12-12/13/2017	16,000
NAP	12/14-12/16/2017	60,000
SAP	12/19/2017	9,600
FGD Pond 4 Road	12/19/2017	4,800
FGD Pond 1	12/19/2017	2,400
FGD Pond 2	12/19/2017	2,400
NAP	12/19/2017	9,600
NAP – North Ash Pond Apron NPDR – North Pond Road SAP – South Ash Pond Apron		SPDR – South Pond Road PLR – Plant Roads CP – Coal Pile

The fugitive dust plan also requires that a PM₁₀ signal from the monitoring station is provided to the control room for data and alarming purposes. The computer will initiate an alarm when the PM₁₀ value exceeds 150 µg/m³ on an hourly average. Although the regulatory standard is based on a 24-hour average, the one-hour values trigger an alarm so that proper corrective action can be initiated in a timely manner to prevent the 24-hour concentration exceeding the standard.

Table 2-2 presents a chronological timeline of plant logs and water truck activities related to the particulate dust suppression at the Naughton Plant on December 7, 2017.

Table 2-2 Dust Suppression Activities on December 7, 2017

Affected Source	Start Time	End Time	Activity	Documentation
Coal pile	06:58	09:00	<ul style="list-style-type: none"> Stop work on pile Visual inspection did not show dust. 	Control Room Log Operation Shifter Log
Mine Ash ponds	10:00	--	<ul style="list-style-type: none"> Called mine to shut down. Deployed water truck to ash ponds 	Control Room Log Operation Shifter Log
NAP NPDR	10:35	12:30	<ul style="list-style-type: none"> Applied over 3000 gallons of water 	Water Truck Log
NAP NPDR SPDR	12:30	16:00	<ul style="list-style-type: none"> Applied over 9000 gallons of water 	Water Truck Log
NAP	13:30	17:00	<ul style="list-style-type: none"> Applied 9000 gallons of water 	Water Truck Log
SAP	14:30	18:30	<ul style="list-style-type: none"> Applied 3000 gallons of chemical suppressant 	Water Truck Log
Mine belt	16:00	--	<ul style="list-style-type: none"> Mine belt off Water truck watering 	Operation Shifter Log
SAP SPDR	17:00	18:00	<ul style="list-style-type: none"> Applied 6000 gallons of water 	Water Truck Log
NPDR SPDR	17:30	22:20	<ul style="list-style-type: none"> Applied 6000 gallons to NPDR Applied 6000 gallons to SPDR 	Water Truck Log
Mine belt	18:00	--	<ul style="list-style-type: none"> Mine belt off Water truck watering Note to keep watering as long as winds are high 	Control Room Log
Ash pond & Coal pile	18:30	--	<ul style="list-style-type: none"> Chemical suppressant being applied to ash pond Continue watering ponds 	Operation Shifter Log
Mine belt & Coal pile	20:00	--	<ul style="list-style-type: none"> All coal activity resumed 	Operation Shifter Log
Mine belt & Coal pile	21:00	--	<ul style="list-style-type: none"> Mine belt off Curtailed coal pile activity 	Control Room Log
NAP – North Ash Pond Apron NPDR – North Pond Road			SAP – South Ash Pond Apron SPDR – South Pond Road	

As can be seen from Table 2-2, site operators acted in accordance with plant policies and procedures to curtail operations and control emissions, and shows the PM₁₀ event was both not reasonably controllable and not reasonably preventable.

2.2. Conceptual Model

As mentioned above, the PacifiCorp Naughton Power Plant operates an instrumented 50-meter meteorological tower adjacent to a continuous particulate matter (PM₁₀) Met One Beta Attenuation Mass (BAM) monitor. Meteorological data are collected by a data acquisition system (DAS) that uses one-second data values to compute and store 5-minute and hourly averages of temperature, delta-temperature, horizontal wind speed (scalar), wind direction (unit vector), sigma theta of wind direction, vertical wind speed, solar radiation, net radiation, precipitation. Figure 2.1 presents a Google Earth map showing the location of the meteorological tower and ambient monitoring station in relation to the plant as well as the locations of the mine and ash ponds.

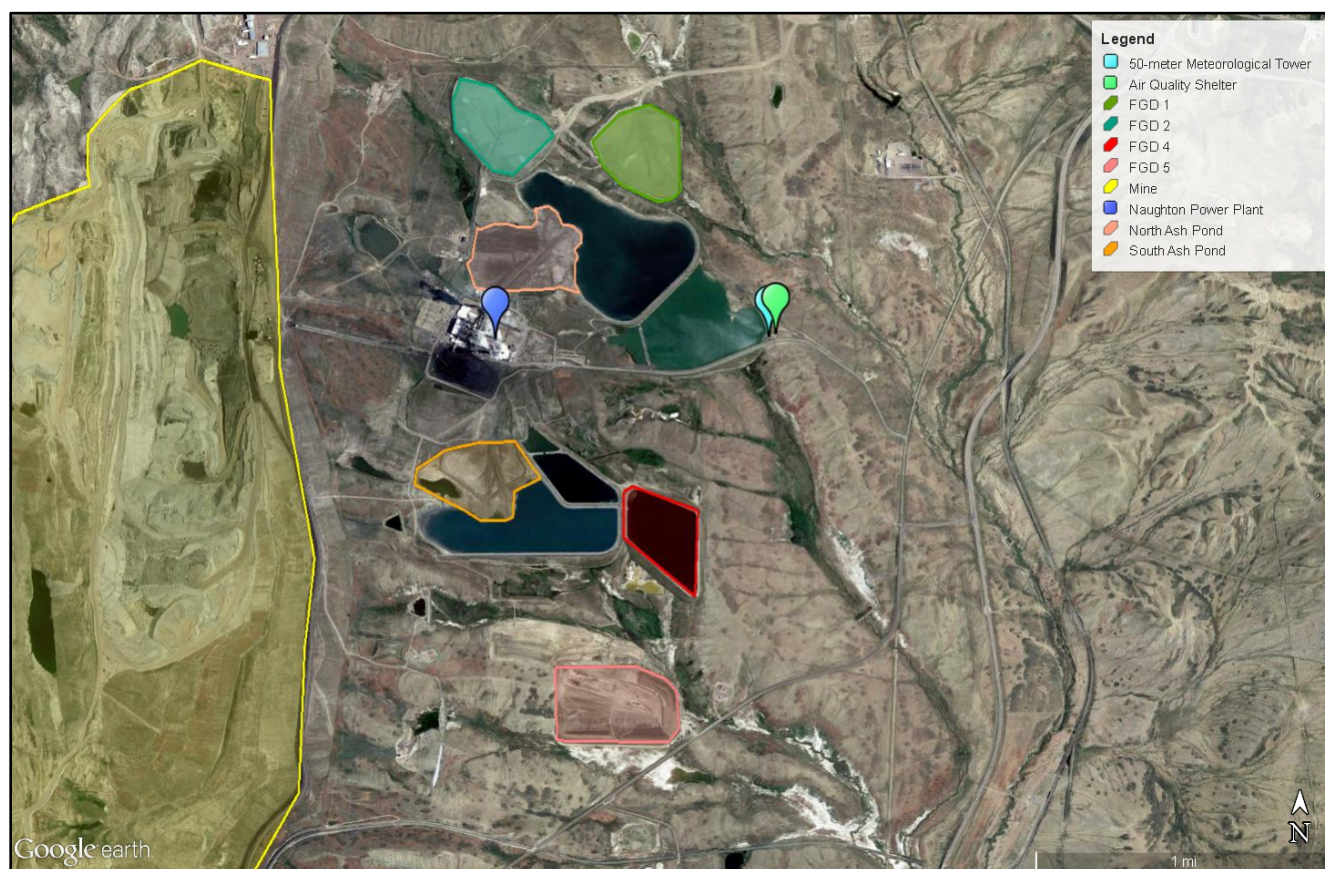


Figure 2.1 Naughton Meteorological Tower and Monitoring Shelter Location

The December 7, 2017 event was the only exceedance of the 24-hour PM₁₀ standard measured at the Naughton monitoring site during the 2017 monitoring year. Nine of the top ten 24-hour concentrations measured in 2017 occurred in the fourth quarter with the second highest 24-hour concentration of 135.4 µg/m³ measured on December 13, 2017. Figure 2.2 presents a chart of the 24-hour concentrations measured throughout the fourth quarter. The chart shows that the 24-hour concentration measured on December 7, 2017 was an outlier for the year. There were no known breakdowns or operational events at the plant that would trigger an exceptionally high release of particulate emissions. Therefore, this was believed to be a natural event caused by high winds.

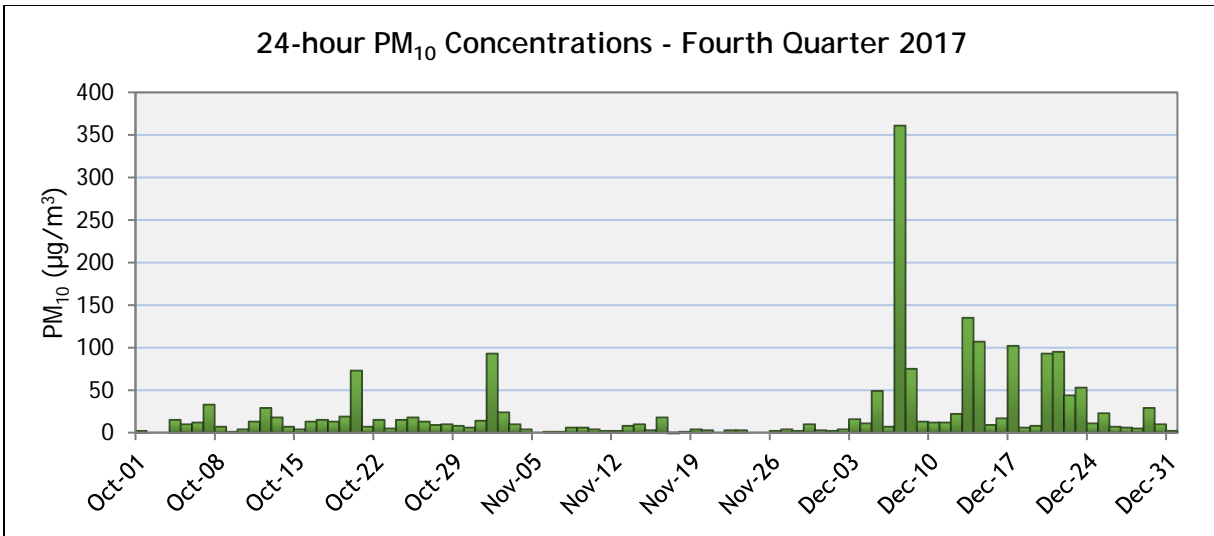


Figure 2.2 24-Hour PM₁₀ Concentrations - Fourth Quarter

A summary of the 10-meter scalar wind speed, 2-meter ambient temperature, relative humidity, and precipitation measured at the site during December 2017 is presented in Table 2-2. Surface measurements are presented here due to the nature of the primary emission sources of PM₁₀ being surface-based ash ponds and coal piles. For comparison, the same data are provided for the day of the exceedance event on December 7, 2017. As can be seen from Table 2-2, the daily average wind speed, in meters per second (mps) on December 7, was approximately 30 percent higher than the monthly average wind speed. The maximum wind speed and the peak gust recorded on December 7 were less than the highest maximum wind speed and peak wind gust measured at the site during the month.

Table 2-3 Surface Meteorological Data Summary from Naughton Tower

Statistic	December 2017	December 7, 2017
10-meter Scalar Wind Speed		
Average	5.8 mps	7.7 mps
Maximum	15.1 mps	15.0 mps
Peak Gust	25.4 mps	20.0 mps
2-meter Ambient Temperature		
Average	-3.0°C	-6.6°C
Maximum	4.3°C	-2.9°C
Relative Humidity		
Average	59%	62%
Maximum	92%	72%
Precipitation		
Total	0.03"	0.00"

Figures 2.3 and 2.4 present windroses for the month of December and for December 7, 2017. The windroses show a contrast of the wind patterns observed throughout the month versus the day of the PM₁₀ event. On December 7, 2017, the winds were predominantly out of the west-northwest with approximately 29 percent or 8 hours having wind speeds greater than 10 mps (22.4 mph). In comparison, 8.7 percent of wind speeds were greater than 10 mps in December 2017 making December 7 windier than normal. Figure 2.1 shows the north ash pond and mine are the predominant wind erosion sources upwind of the monitoring site during the wind event.

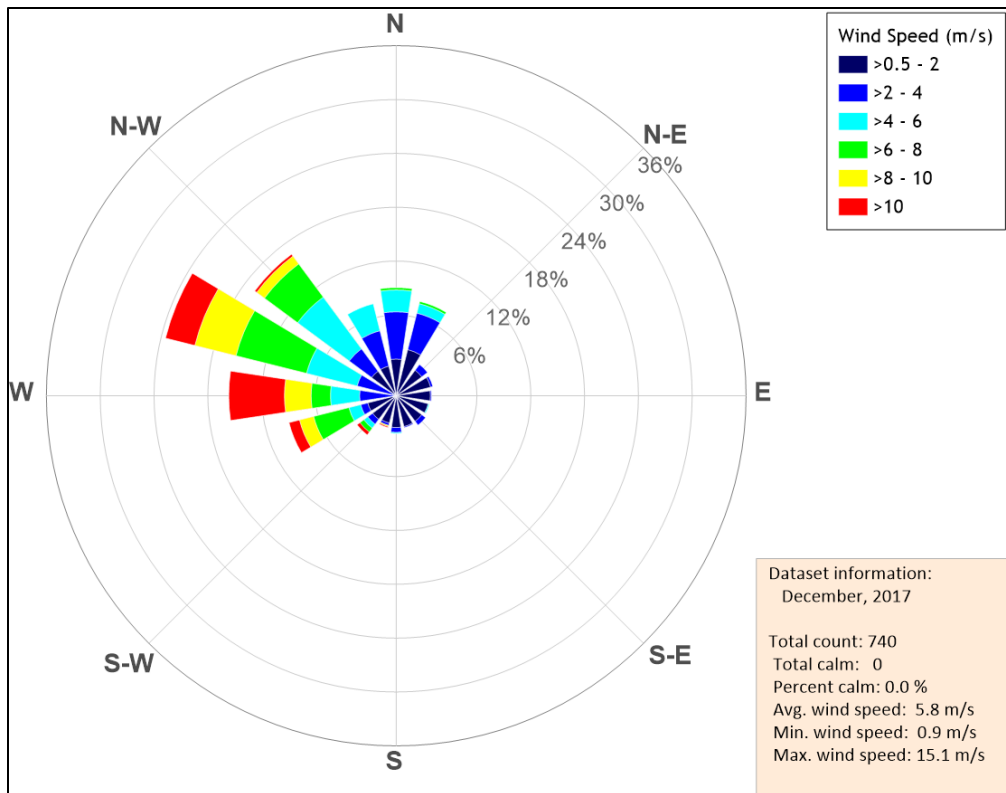


Figure 2.3 10-meter Level Windrose for December 2017

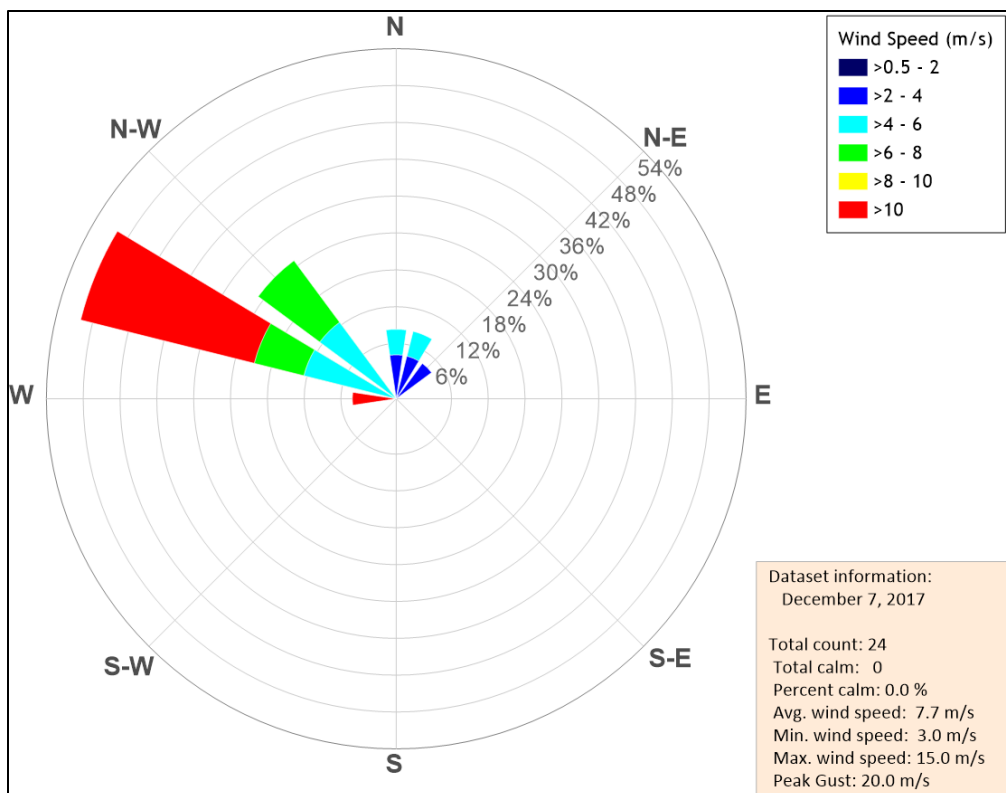


Figure 2.4 10-meter Level Windrose for December 7, 2017

Figure 2.5 presents a chart showing the 5-minute meteorological and hourly PM₁₀ data observed at the monitoring site on December 7, 2017. The green bars in Figure 2.5 represent the hourly PM₁₀ concentrations measured at the ambient air quality site; the solid blue line represents the five-minute sustained wind speeds and the dotted line represents the maximum gust measured during each five-minute period. Figure 2.5 shows the hourly elevated concentration started during the 10:00 Mountain Time (MT) observation with sustained wind speeds exceeding 10 mps. PM₁₀ concentrations remained above 150 µg/m³ through 18:00 MT but decreased during 19:00 and 20:00 hours when wind speeds decreased. The PM₁₀ concentration exceeded 150 µg/m³ during 21:00 and 22:00 hours when wind gusts peaked above 10 mps. As indicated by the BAM, maximum concentrations measured between 10:00 and 18:00 MT peaked at 985 µg/m³, which is the BAM's upper limit for the instrument.

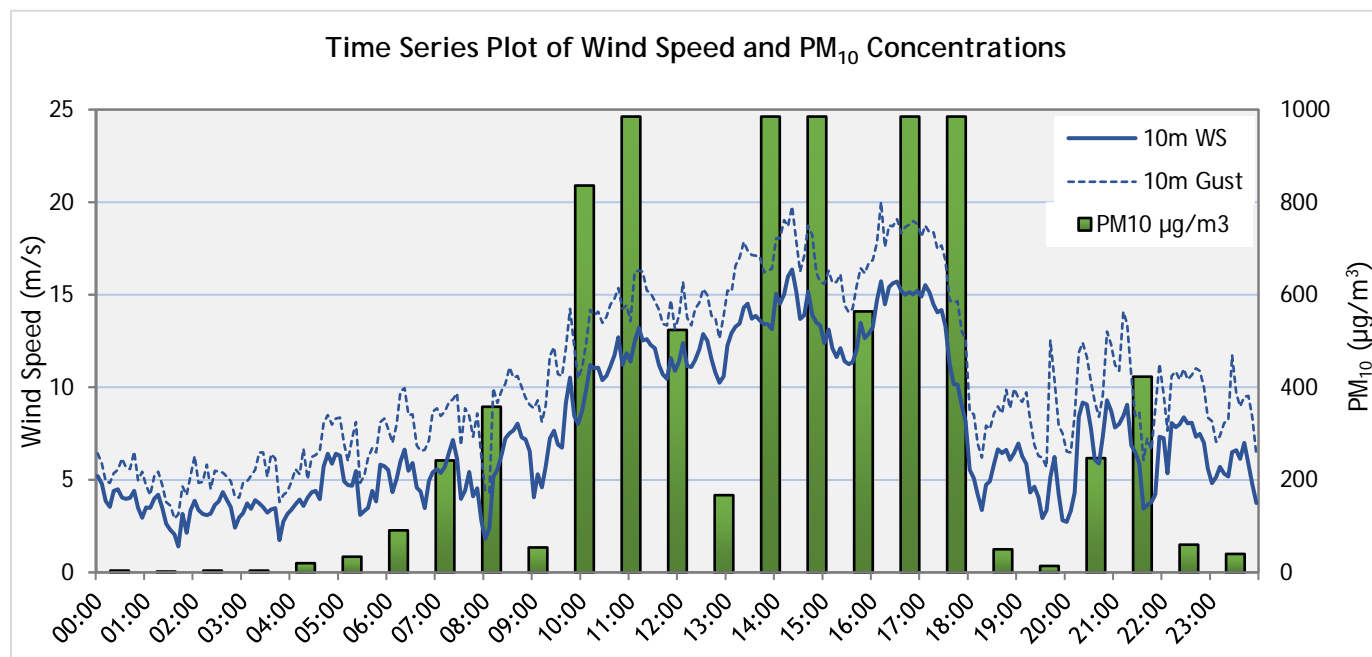


Figure 2.5 Time Series Plot of 5-minute Wind Speed and Hourly PM₁₀ Concentrations

APPENDIX A: SITE OPERATOR LOG, WATER TRUCK LOGS, AND EMAIL
CORRESPONDENCE

		Operations Shifter's Log (for previous 24 hours)
		Thursday, December 07, 2017
Copeland	06:58	Pm 10 in alarm on honeywell stop work on coal pile
	07:00	Held Crew Meeting. Reminded crew about the road repairs.
	08:00	Had unit 3 operator wash down the coal dust from yesterday's coal leaks.
	08:30	1-2 cooling tower fan tripped called Elect.
	10:00	Called mine to shut down mine because of pm 10 high winds. Wind is now holding above 30 MPH. Water truck out on the ash pond for dust control.
	10:20	Elect. Repair 1-2 cooling tower fan. Bad fuse
	11:00	I&C Repaired unit 3 A absorber density meter.
	16:00	Pm 10 still in alarm. Running between 166 to 988 all day, mine belt off water truck watering all day, wind blowing 20 to 40 mph all day.
	Note	Keep the water trucks running tonight as long as the winds are still high and we can do it safely.
Larsen	18:30	Weeden on site to spray chemical on ash ponds, holding over EO to continue watering ash ponds, still curtailing coal pile activities
	19:00	Crew tailboard, discussed crew safety topic for December and cleaning area, reviewed job safety briefs
	20:00	PM 10 down, taking coal and resuming coal pile activities
	21:30	PM 10 back in alarm, curtailing coal deliveries and pile activity, water truck continuing to water ash ponds
	23:00	Air line broke on hydroveyor solenoid for U2 mechanicals, I&C will repair
	00:30	PM 10 back down again, resuming coal deliveries and pile activity as needed



DUST SUPPRESSION LOG
NAUGHTON POWER PLANT
All Dust Suppression Related Activities Must be Logged

Date	Start Time	End Time	Operators Name (Print)	Material Hauled*	Number of Loads	Est. Amount per Load (gallons)	Area Watered / Comments
				W = Water Only; DC = Dust Control Chemical			<u>Indicate which FGD pond is sprayed</u> CP = Coal Pile; PLR = Plant Roads; SPDR = South Pond Roads; NPDR = North Pond Roads; NAP = North Ash Pond Apron; SAP = South Ash Pond Apron
5-13-17	1500	1545	Math Monow Mike Breese	W	2	3K	CP + PLR
5-25-17	1100	1500	Wayne Stubbs	W	4	3K	PLR
5-31-17	14:45	1500	Roger Laird	W	1	3K	PLR
6-5-17	0730	1500	W. Stubbs	W	5 1/2	3K	PLR
6-6-17	0730	1200	W. Stubbs	W	4 1/2	3K	PLR
6-7-17	1000	1430	"	DC	5	3K	SPDR, SAP, NPDR
6-8-17	0800	1400	"	"	5	3K	NPDR, NAP
6-10-17	13:35	15:20	Roger Laird	W	3	3K	PLR, NPDR, SPDR
6-12-17	13:30	15:00	Roger Laird	W	3	3K	PLR, NPDR, SPDR

*Fill Out Separate Lines for each Material Hauled



DUST SUPPRESSION LOG
NAUGHTON POWER PLANT
All Dust Suppression Related Activities Must be Logged

Date	Start Time	End Time	Operators Name (Print)	Material Hauled*	Number of Loads	Est. Amount per Load (gallons)	Area Watered / Comments	
				W = Water Only; DC = Dust Control Chemical			<u>Indicate which FGD pond is sprayed</u> CP = Coal Pile; PLR = Plant Roads; SPDR = South Pond Roads; NPDR = North Pond Roads; NAP = North Ash Pond Apron; SAP = South Ash Pond Apron	
7-19-17	1300	1400	W. Stubbs	W	2	3K	NAP, SAP, SPDR, NPDR.	11
7-20-17	1000	1100	W. Stubbs	W	2	3K	NAP, NPDR, SAP, SPDR.	11
8-7-17	1300		R. Proderit	W	1	3K	CP	
8-28-17	10:00	3:00	M. Brese	W DC	5	3K	Plant Roads	
8-29-17	8:00	2:30	M. Brese	W DC	6	3K	Plant Roads	
9-14-17	12:00	12:30	R. Laird	W	1	3K	Plant Roads	
10-16-17	1400	1430	W. Stubbs	W	1	3K	NAPR	1 -
10-17-17	0730	0830	W. Stubbs	W	2	3K	SPDR, NAPR	11
10-18-17	1000	1030	W. Stubbs	W	1	3K	NAPR	1

*Fill Out Separate Lines for each Material Hauled



DUST SUPPRESSION LOG
NAUGHTON POWER PLANT
All Dust Suppression Related Activities Must be Logged

Date	Start Time	End Time	Operators Name (Print)	Material Hauled*	Number of Loads	Est. Amount per Load (gallons)	Area Watered / Comments
				W = Water Only; DC = Dust Control Chemical			<u>Indicate which FGD pond is sprayed</u> CP = Coal Pile; PLR = Plant Roads; SPDR = South Pond Roads; NPDR = North Pond Roads; NAP = North Ash Pond Apron; SAP = South Ash Pond Apron
10-18-17	1500	1600	W. Stubbs	W	2	3K	SPDR, NPDR
10-18-17	1600	1800	W. Stubbs	DC	2	3K	FGD Pond 1.
10-19-17	0800	0830	"	DC	1	3K	FGD Pond 4 road.
"	1300	1500	"	"	3	3K	FGD Pond 2
10/20/17	11:30	1500	Chance Burdett	W	46	3K	PLR, SPDR, CP, NPDR
10-21-17	1400	1500	W. Stubbs	W	3		SPDR, NPDR
10/22/17	1100	1600	R. Prodrick	W	4		SPDR, NPDR
10-24-17	1200			W			
10-25-17	1330	1400	W. Stubbs	W	1		NPDR
10-30-17	1230	1330	"	"	"		"

*Fill Out Separate Lines for each Material Hauled

Attachment A



DUST SUPPRESSION LOG NAUGHTON POWER PLANT All Dust Suppression Related Activities Must be Logged

Date	Start Time	End Time	Operators Name (Print)	Hauled*	Number of Loads	Est. Amount per Load (gallons)	Area Watered / Comments
				W = Water Only DC = Dust Chemical			CP = Coal Pile; PLR = Plant Roads; PDR = Pond Roads NAP = North Ash Pond Apron; SAP = South Ash Pond Apron
11-1-17	1 Pm	6 Pm	Hydroseed truck William & Curtis	DC	2	4000	Sap
11-1-17	1 Pm	6 Pm	4000 gal water truck troy	DC	2	4000	Sap
11-2-17	1:30 Pm	6:30 Pm	Hydroseed truck William - Curtis	DC	2	4000	Sap
11-2-17	1:30 Pm	6:30 Pm	4000 gal water truck troy	DC	2	4000	Sap.
11-27-17	7:00 Am	5:00 Pm	4000 gal water truck Matt	DC	6	4000	n.a.p.
11-27-17	7:00 Am	5:00 Pm	Hydroseed truck Billy	DC	6	4000	2 loads fGD pond 2 4 loads n.a.p.
11-28-17	6:30 Am	5:00 Pm	4000 gal water truck Matt	DC	5	4000	fGD # 2.
11-28-17	6:30 Am	5:00 Pm	Hydroseed truck Billy	DC	5	4000	3 loads fGD # 2 2 loads fGD # 1
11-29-17	7:00 Am	11:00 Am	Hydroseed truck Billy & Matt	DC DC	2	4000	2 loads fGD # 1

*Fill Out Separate Lines for each Material Hauled

When printed, this document is uncontrolled and for reference only



DUST SUPPRESSION LOG
NAUGHTON POWER PLANT
All Dust Suppression Related Activities Must be Logged

Date	Start Time	End Time	Operators Name (Print)	Material Hauled*	Number of Loads	Est. Amount per Load (gallons)	Area Watered / Comments
				W = Water Only; DC = Dust Control Chemical			Indicate which FGD pond is sprayed CP = Coal Pile; PLR = Plant Roads; SPDR = South Pond Roads; NPDR = North Pond Roads; NAP = North Ash Pond Apron; SAP = South Ash Pond Apron
10/31	10:00	—	M. Bruce	D, C & W	5	3K	North Ash Pond → Coal Pile South Ash Pond
11/1	9:00	—	M. Bruce	D, C & W	1	3K	South Ash Pond South Apron
11/1	10:30	13:00	Jesse Owens	W	4	3K	Coal Pile, South Ash Pond, South Apron
11-2	11:00	11:30	W. Stubbs	W	1	3K	NAPR
11-24	11:00	11:35	R. Laird	W	1	3K	CP, PLR, NAP
11-24	13:30	14:00	R. Laird	W	1	3K	CP, PLR
12-3	10:00	12:00	R. Laird	W	3	3K	PLR, CP, SPDR, NPDR
12-7	10:35	12:30	J. Owens	W	1 + a Partial	3K	NAP ^{NAPR} Got stuck w/ second load NAP
12-7	12:30	16:00	J. Owens	W	3	3K	SAP, NAP SPDR, NAP, NPDR
12-7	17:00	18:00	J. Owens	W	2	3K	SPDR, SAP

*Fill Out Separate Lines for each Material Hauled

Attachment A



DUST SUPPRESSION LOG NAUGHTON POWER PLANT All Dust Suppression Related Activities Must be Logged

Date	Start Time	End Time	Operators Name (Print)	Hauled*	Number of Loads	Est. Amount per Load (gallons)	Area Watered / Comments CP = Coal Pile; PLR = Plant Roads; PDR = Pond Roads NAP = North Ash Pond Apron; SAP = South Ash Pond Apron
				W = Water Only DC = Dust Chemical			
11-29-17	7:00 AM	11:00 AM	4000 gal water truck in wet	DC	2	4000	FGD #1



*Fill Out Separate Lines for each Material Hauled

When printed, this document is uncontrolled and for reference only

Attachment A



DUST SUPPRESSION LOG NAUGHTON POWER PLANT All Dust Suppression Related Activities Must be Logged

 Date	 Start Time	End Time	Operators Name (Print)	Hauled*	Number of Loads	Est. Amount per Load (gallons)	Area Watered / Comments CP = Coal Pile; PLR = Plant Roads; PDR = Pond Roads NAP = North Ash Pond Apron; SAP = South Ash Pond Apron
				W = Water Only DC = Dust Chemical			
12/7/17	1:30	5:00	Carl Bricksch	W	1471 6	1500	NAP

*Fill Out Separate Lines for each Material Hauled

When printed, this document is uncontrolled and for reference only



DUST SUPPRESSION LOG
NAUGHTON POWER PLANT
All Dust Suppression Related Activities Must be Logged

Date	Start Time	End Time	Operators Name (Print)	Material Hauled*	Number of Loads	Est. Amount per Load (gallons)	Area Watered / Comments
				W = Water Only; DC = Dust Control Chemical			<u>Indicate which FGD pond is sprayed</u> CP = Coal Pile; PLR = Plant Roads; SPDR = South Pond Roads; NPDR = North Pond Roads; NAP = North Ash Pond Apron; SAP = South Ash Pond Apron
12-7-17	17:30	22:20	J. Owens	W	4	3K	2- SPDR 2- NPDR
12-8-17	24:00	03:00	R. Prodrif	W	2	3K	SPDR - 1 NPDR - 1
12-8-17	0830	1500	W. Stubbs	DC	5	3K	NPDR, NAP
12-10-17	0800	1600	M. Morrow	W	5	3K	CP, PLR, SPDR, NAP
12-11-17	1230	1330	D. Peay	W	1	3K	SAP
12-12-17	10:30	12:30	R. Laird	DC	2	4K	SAP
12-13-17	8:00	12:00	A. Peay	DC	1	4K	SAP
12-13-17	13:00	15:00	M. Quinn	DC	1	4K	SAP
12-15-17	24:33		Chance Bursley	W	1	4K	NAP Records
12-16-17	11:00	11:30	ZAY PRODRIF	DC	1	4	NAP

*Fill Out Separate Lines for each Material Hauled

Attachment A



DUST SUPPRESSION LOG NAUGHTON POWER PLANT All Dust Suppression Related Activities Must be Logged

Date	Start Time	End Time	Operators Name (Print)	Hauled*	Number of Loads	Est. Amount per Load (gallons)	Area Watered / Comments CP = Coal Pile; PLR = Plant Roads; PDR = Pond Roads NAP = North Ash Pond Apron; SAP = South Ash Pond Apron
				W = Water Only DC = Dust Chemical			
12-7-17	2:30	6:30	Pin Hydroseed services truck	DC	1	3000	South ash Pond
12-8-17	7:00	5:00	Hydroseed truck Pin services	DC	1111	3000	North ash Pond

*Fill Out Separate Lines for each Material Hauled

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Rev: #5

Attachment A



DUST SUPPRESSION LOG NAUGHTON POWER PLANT

All Dust Suppression Related Activities Must be Logged

Dustbusters Inc.
Mag-Chloride Roads

2017

Date	Start Time	End Time	Operators Name (Print)	Hauled* W = Water Only DC = Dust Chemical	Number of Loads	Est. Amount per Load (gallons)	Area Watered / Comments CP = Coal Pile; PLR = Plant Roads; PDR = Pond Roads NAP = North Ash Pond Apron; SAP = South Ash Pond Apron
12/19	10:00		Dave Jones	DC	2	4800	South Ash Pond
12/19			Ian Redding	DC	1	4800	FGD 4
12/19			"	DC	0.5	4800	FGD 1
12/19			"	DC	0.5	4800	FGD 2
12/19			Ian Redding	DC	2	4800	North Ash Ponds
12/19		13:00	"		1	4800	Raw Water area

*Fill Out Separate Lines for each Material Hauled

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Rev: #5
Revised: 3/2016

Jason = (307) 828-4275
4365

Attachment A



DUST SUPPRESSION LOG NAUGHTON POWER PLANT All Dust Suppression Related Activities Must be Logged

Date	Start Time	End Time	Operators Name (Print)	Hauled* W = Water Only DC = Dust Chemical	Number of Loads	Est. Amount per Load (gallons)	Area Watered / Comments CP = Coal Pile; PLR = Plant Roads; PDR = Pond Roads NAP = North Ash Pond Apron; SAP = South Ash Pond Apron
12/14/17	0700	1600	Dustin Peay	DC	2	8K	NAP
12/15/17	0700	1730	Dustin Peay	DC	3	8K	NAP
12/14/17	1100	1800	RAY PRODDIT	2-DC 1-W	3	8K	NAP
12/17/17	1000	1400	Dustin Peay Jesse Owens	2.5W	2.5	20K	NAP, SAP
12/18/17	1000	1400	Dustin Peay	W	2	8K	NAP PDR
12/20/17	10:00	15:30	Chamse Burdess	W	2	8K	SAP
12/22/17	10:15	10:45	Chamse Burdess	W	1	4K	SAP
12/22/17	15:20	16:26	C. Burdess	W	1	8K	SAP
12-29-17	10:30	11:00	R. Laird	W	1	8K	CP, SAP, PDR

*Fill Out Separate Lines for each Material Hauled

When printed, this document is uncontrolled and for reference only

Attachment A



DUST SUPPRESSION LOG NAUGHTON POWER PLANT All Dust Suppression Related Activities Must be Logged

Date	Start Time	End Time	Operators Name (Print)	Hauled* W = Water Only DC = Dust Chemical	Number of Loads	Est. Amount per Load (gallons)	Area Watered / Comments CP = Coal Pile; PLR = Plant Roads; PDR = Pond Roads NAP = North Ash Pond Apron; SAP = South Ash Pond Apron
12-18-17	10:00	6:30	Matt; Dalton Billy	Hydro mulch	10	1200 gal. 500 lbs	South ash pond - west end.
12-19-17	6:30	6:30	Matt - Dalton	Hydro mulch	16	1200 gal 500 lbs.	South ash pond
12-19-17	3:30	6:30	Curtis Billy	Hydro mulch	2	3300 gal 2000 lbs.	South ash pond east end.
12-20-17	6:30	6:30	Matt - Billy.	Hydro mulch	16	2000 lbs 3300 gal	South ash pond
12-20-17	12:00 PM	6:30 PM	Curtis - Dalton	Hydro mulch	5	500 lbs 1800 gal	South ash pond
12-29-17	7:00 AM	6:30 PM	Dalton Billy - Matt	Hydro mulch	16	2000 lbs 3300 gal	4 loads south ash 2 loads north ash.
12-30-17	7:00 AM	3:00 PM	Dalton Billy - Matt	Hydro mulch	12	2000 lbs 3300 lbs	12 loads on north ash pond.

*Fill Out Separate Lines for each Material Hauled

When printed, this document is uncontrolled and for reference only

From: [Holt, Rodger](#)
To: [Murdock, Jason](#)
Subject: PM from mine
Date: Thursday, December 07, 2017 2:44:00 PM
Attachments: [20171207_144158.jpg](#)
[20171207_144151.jpg](#)

We are also getting some from the mine

Sent from my Verizon 4G LTE smartphone

From: [Holt, Rodger](#)
To: [Murdock, Jason](#)
Subject: FW: Ash Pond Watering for PM10
Date: Friday, December 08, 2017 8:48:40 AM

From: Larsen, Eric
Sent: Thursday, December 07, 2017 7:01 PM
To: Holt, Rodger <Rodger.Holt@pacificorp.com>
Cc: Sparks, John <John.Sparks@pacificorp.com>; Dearden, Mark <Mark.Dearden@pacificorp.com>
Subject: Ash Pond Watering for PM10

Weeden is on site with their long range spraying truck. They are picking up chemical and I have directed them to focus their efforts on the north ash pond. I also held over J. Owens to continue running our truck.

[Eric Larsen](#)
[Operations Shift Supervisor](#)
[Naughton Plant](#)
[\(307\)828-4250](#)
Eric.Larsen@Pacifcorp.com

From: [Murdock, Jason](#)
To: [Jon Walker \(jon.walker@wyo.gov\)](#); [Steven Mugg](#)
Cc: [Shakespear, Brett](#); [Holt, Rodger](#); [Cara Keslar \(cara.keslar@wyo.gov\)](#); [Wiscomb, Thomas](#)
Subject: Naughton Power Plant PM-10
Date: Friday, December 08, 2017 9:06:25 AM

Jon / Steve-

I am sending this email as an notification of a possible PM-10 exceedance that occurred at the Naughton Power Plant on 12/7/2017. The preliminary data indicates the PM-10 concentration was 302.5 ug/m3 for the 24 hour period. During yesterday's event we were experiencing high winds up to 40 miles per hour. As part of our fugitive dust plan's requirements, we stopped coal delivery and our equipment and a contractor's water truck were out watering various areas of the plant to mitigate the dust from the high winds and dry conditions we are currently experiencing. As part of this notification, we will be pursuing an exceptional event designation for this event.

If you have any questions feel free to give me a call.

Jason

Jason Murdock
Naughton Power Plant
Kemmerer, Wyoming
Phone: 307-828-4365
Fax: 307-877-2903

From: [Cunningham, John](#)
To: [Holt, Rodger](#); [Sparks, John](#); [Murdock, Jason](#)
Cc: [Dearden, Mark](#)
Subject: Pond Sealing
Date: Thursday, November 30, 2017 9:24:48 AM

I just got word from MK Weeden that all the pond sealing was completed. They were unable to seal the very center of FDG2 due to the mud, but everything else is complete. They will be bringing me the log book and a highlighted map soon.

Let me know if there are any questions.

Thank you

John Cunningham
Plant Operations Supervisor, Coal Yard
Rocky Mountain Power -Naughton Plant
John.cunningham@pacificorp.com
Office: 307-828-4212
Cell: 307-871-4461

From: [Holt, Rodger](#)
To: [Cunningham, John](#); [Corbett, Michael](#)
Cc: [Sparks, John](#); [Murdock, Jason](#)
Subject: Pond Sealing
Date: Tuesday, December 12, 2017 9:59:34 AM

As discussed, please keep a primary focus on the re-sealing of the South Ash Pond. It is critical that this work be completed by the end of day Thursday (12/14). If you need any help with Wheeler regarding the rental spray truck or MK Weeden on the hydro-seed please let me know. You are fully authorized to call OT as you deem necessary to ensure this is completed. Please keep me posted on progress, and let me know if you need anything. Thanks!

Stay Safe!
Rodger Holt

APPENDIX B: PHOTOGRAPHS



North Ash Pond



North Ash Pond



North Ash Pond



North Ash Pond



North Ash Pond



North Ash Pond



North Ash Pond



Stuck in North Ash Pond



Stuck in North Ash Pond



South Ash Pond



South Ash Pond



South Ash Pond



North Ash Pond



North Ash Pond



Dust from mine



Dust from mine



Applying dust control chemical to North Ash Pond



Rental Water Truck South Ash Pond



Plant Dust Control Equipment North Ash Pond



Hydro seeding South Ash Pond



Hydro seeding South Ash Pond

APPENDIX M

Initial Notification Summary Information Form

EE Initial Notification Summary Information

PM₁₀ Template

Submitting Agency: Wyoming Department of Environmental Quality - Air Quality Division

Agency Contact: Daniel Sharon

Date Submitted:

Applicable NAAQS: 24-hour PM₁₀

Affected Regulatory Decision¹:

(for classification decisions, specify level of the classification with/without EE concurrence)

Area Name/Designation Status: Kemmerer, Wyoming/Attainment

Design Value Period (list three year period): 2014-2017

(where there are multiple relevant design value periods, summarize separately)

A) Information specific to each flagged monitor day that may be submitted to EPA in support of the affected regulatory decision listed above

Date of Event	Type of Event (high wind, volcano, wildfires/prescribed fire, other ²)	AQS Flag	Monitor AQS ID (and POC)	Monitor Name	Exceedance Concentration (with units)	Notes (e.g. event name, links to other events)
December 7, 2017	High Wind	RJ	56-023-0820	Naughton	360.8 ug/m3	December 7, 2017 High wind

B) Violating Monitors Information

(listing of all violating monitors in the planning area, regardless of operating agency, and regardless of whether or not they are impacted by EEs)

Monitor (AQS ID and POC)	Design Value (<u>without</u> EPA concurrence on any of the events listed in table A above)	Design Value (<u>with</u> EPA concurrence on all events listed in table A above)
56-023-0820 81102 2	0.3 Expected Number of Exceedances (ENE)	0.0 Average ENE

¹ designation, classification, attainment determination, attainment date extension, or finding of SIP inadequacy leading to SIP call

² Provide additional information for types of event described as "other"

C) Summary of Maximum Design Value (DV) Monitor Information (Effect of EPA Concurrence on Maximum Design Value Monitor Determination)

(Two highest values from Table B)

Maximum DV monitor (AQS ID and POC) <u>without</u> EPA concurrence on any of the events listed in table A above	Design Value 0.3 ENE	Design Value Monitor 56-023-0820	Comment Lone PSD monitor in network
Maximum DV monitor (AQS ID and POC) <u>with</u> EPA concurrence on all events listed in table A above	Design Value 0.0 ENE	Design Value Monitor 56-023-0820	Comment Lone PSD monitor in Network

D) List of any monitors (AQS ID and POC) within planning area with invalid design values (e.g. due to data incompleteness)

Murdock, Jason

From: Daniel Sharon <daniel.sharon@wyo.gov>
Sent: Monday, February 12, 2018 11:23 AM
To: Murdock, Jason
Cc: Gregory Meeker; Cara Keslar; Leif Paulson
Subject: [INTERNET] Re: Naughton Power Plant PM-10
Attachments: ee_initial_notification_pm10_template_20160425.pdf; Exceedance Documentation Update to 4-2-15 letter_signed.pdf

**** STOP. THINK. External Email ****

Hello Jason,

I have reviewed the Naughton Power Plant Q4 2017 PM10 ambient monitoring report. This report confirms that there was an exceedance of the PM10 NAAQS on 12/7/17 with a 24-hour concentration of 361 ug/m3. However the report is deficient in several areas in relation to this exceedance.

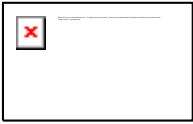
First, the AQD sent out a letter (attached) to all facilities with ambient monitoring on August 28, 2017 by email regarding updated requirements for exceedance and Exceptional Events documentation. Section 2 of this letter provides a list of detailed information that is expected to be provided in the quarterly report whenever an exceedance occurs. This information includes, among other things, validated relevant CEMs data for the day, an overview of facility compliance on the exceedance day, and a discussion of facility operations. Based on my review, this required information was not included in the quarterly report.

Second, your email below and section 3-4 of the report indicate that Naughton intends to put together an Exceptional Event demonstration for this exceedance. Also per the attached letter, if a facility wishes to pursue an EE for an exceedance, they must complete EPA Region 8's "Initial Notification" form (also attached) and submit it with the appropriate quarterly report. It does not appear that this form was submitted with the Q4 2017 report.

Please revise the Q4 2017 report to include all the information outlined in Section 2 of the attached letter as it relates to the 12/7/17 exceedance. Additionally, if Naughton wishes to pursue an Exceptional Event for this exceedance, please fill out and submit the Initial Notification form as well. Please submit the revised report through IMPACT. Let me know if you have any questions about these revisions.

Thank you,

Daniel Sharon
Air Quality Monitoring Project Manager
Wyoming DEQ, Air Quality Division
200 W. 17th St., 3rd Floor
Cheyenne, WY 82002
Office: (307) 777-7104
Email: daniel.sharon@wyo.gov



On Mon, Dec 11, 2017 at 8:09 AM, Cara Keslar <cara.keslar@wyo.gov> wrote:

Cara Keslar
Monitoring Section Supervisor
Wyoming DEQ - Air Quality Division
(307) 777-8684 (office)
(307) 286-2383 (cell)
cara.keslar@wyo.gov

----- Forwarded message -----

From: **Murdock, Jason** <Jason.Murdock@pacificorp.com>
Date: Fri, Dec 8, 2017 at 9:06 AM
Subject: Naughton Power Plant PM-10
To: "Jon Walker (jon.walker@wyo.gov)" <jon.walker@wyo.gov>, Steven Mugg <steven.mugg@wyo.gov>
Cc: "Shakespear, Brett" <Brett.Shakespear@pacificorp.com>, "Holt, Rodger" <Rodger.Holt@pacificorp.com>, "Cara Keslar (cara.keslar@wyo.gov)" <cara.keslar@wyo.gov>, "Wiscomb, Thomas" <Thomas.Wiscomb@pacificorp.com>

Jon / Steve-

I am sending this email as an notification of a possible PM-10 exceedance that occurred at the Naughton Power Plant on 12/7/2017. The preliminary data indicates the PM-10 concentration was 302.5 ug/m3 for the 24 hour period. During yesterday's event we were experiencing high winds up to 40 miles per hour. As part of our fugitive dust plan's requirements, we stopped coal delivery and our equipment and a contractor's water truck were out watering various areas of the plant to mitigate the dust from the high winds and dry conditions we are currently experiencing. As part of this notification, we will be pursuing an exceptional event designation for this event.

If you have any questions feel free to give me a call.

Jason

Jason Murdock

Naughton Power Plant

Kemmerer, Wyoming

Phone: [307-828-4365](tel:307-828-4365)

Fax: [307-877-2903](tel:307-877-2903)

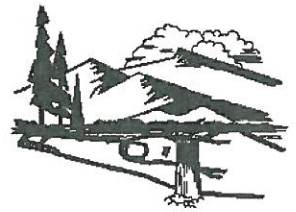
E-Mail to and from me, in connection with the transaction of public business, is subject to the Wyoming Public Records Act and may be disclosed to third parties.

E-Mail to and from me, in connection with the transaction of public business, is subject to the Wyoming Public Records Act and may be disclosed to third parties.



Department of Environmental Quality

To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.



Matthew H. Mead, Governor

Todd Parfitt, Director

February 21, 2018

Jason Murdock
PacifiCorp Naughton Power Plant
P.O. Box 191
Kemmerer, WY 83101

RE: Request to flag data as due to Exceptional Event under 40 CFR 50.14

Dear Mr. Murdock,

This letter confirms the receipt by the Air Quality Division (AQD) of your Exceptional Event Flag Request for the following PM₁₀ monitored exceedance at the PacifiCorp Naughton Power Plant located in Lincoln County, Wyoming: December 7th, 2017 at the PM₁₀ Monitor. The request to flag data was received on February 19th, 2018 in the revised quarter 4, 2017 report submitted via IMPACT (MRPT001468).

Per the AQD's August 25, 2017 Exceptional Event Review Process document and accompanying letter, facilities are expected to include detailed information regarding the exceedance in the appropriate quarterly report, which the AQD then reviews for potential compliance issues to make a determination whether an Exceptional Event Demonstration should be submitted. Because a full Exceptional Event Demonstration was included in the Naughton quarter 4, 2017 report, in this case the AQD will complete a full review of the Demonstration prior to forwarding it and the Initial Notification to EPA Region 8. The Demonstration will be reviewed by an AQD team and you will be notified as to whether or not the request fulfills all necessary requirements in accordance with 40 CFR Part 50.14.

The AQD offers a maximum of two (2) opportunities for additional information submittal by the company and AQD team review, at the discretion of the team. After a final submittal, a team decision will be made to either approve or disapprove your request to flag data. After the review process, if the decision to approve your request is made, a thirty (30) day public comment period is required. The Exceptional Event Flag Request will be submitted, by the AQD, to EPA Region 8 for concurrence.

If the decision is made to disapprove your request, you will be notified and provided with the reason(s) for denial.

Please contact me at daniel.sharon@wyo.gov or 307-777-7104 if you have questions concerning this matter or need additional guidance.

Sincerely,

Daniel Sharon
Air Quality Analyst
Wyoming DEQ – Air Quality Division

Cc: Cara Keslar, Monitoring Section Supervisor
Greg Meeker, District Engineer

Murdock, Jason

From: Jon Walker <jon.walker@wyo.gov>
Sent: Monday, February 26, 2018 9:47 AM
To: Murdock, Jason
Subject: [INTERNET] Exceptional Event Info
Attachments: Naughton 12-7 Exceptional Event Info.pdf; Naughton 2014 Fugitive Dust Control Plan.pdf

**** STOP. THINK. External Email ****

Hi Jason,

The AQD will be having an internal meeting on March 12 to discuss PacifiCorp's Exceptional Event Demonstration for the December 7 PM10 Exceedance. I have attached relevant information that was submitted and it is pretty thorough. For the upcoming meeting I will be responsible for providing the compliance status of the facility during the event. Could I ask you to please provide a status for each of the items shown in the attached fugitive dust control plan during the December 7 exceedance? If items are already discussed in the submittal, just refer to it. I just want to make sure that I have all of the information that I need for the meeting. It looks like PacifiCorp has Hydroseeded some areas to make sure there is no recurrence. It might be good for us to have a telecon to talk about the contents of the Exceptional Event submittal to make sure I understand everything.

Thank you,
Jon

Jon Walker, P.E. | WDEQ Air Quality Engineer | Office: 307-335-6960 | Cell: 307-349-0006 | jon.walker@wyo.gov

E-Mail to and from me, in connection with the transaction of public business, is subject to the Wyoming Public Records Act and may be disclosed to third parties.

Murdock, Jason

From: Jon Walker <jon.walker@wyo.gov>
Sent: Tuesday, February 27, 2018 10:01 AM
To: Murdock, Jason
Subject: [INTERNET] AQD Question

**** STOP. THINK. External Email ****

Jason,

Has the apron of the north ash pond also been hydroseeded? Only pictures of the south ash pond are shown in the Exceptional Event package.

Thank you,
Jon

Jon Walker, P.E. | WDEQ Air Quality Engineer | Office: 307-335-6960 | Cell: 307-349-0006 | jon.walker@wyo.gov

E-Mail to and from me, in connection with the transaction of public business, is subject to the Wyoming Public Records Act and may be disclosed to third parties.

Murdock, Jason

From: Murdock, Jason
Sent: Tuesday, February 27, 2018 10:13 AM
To: 'jon.walker@wyo.gov'
Subject: RE: [INTERNET] AQD Question
Attachments: RIMG0119.JPG; RIMG0117.JPG; RIMG0118.JPG

Yes, they started on the north, attached are some pictures. Not done yet, got some more to spray this spring.

Jason Murdock
Naughton Power Plant
Kemmerer, Wyoming
Phone: 307-828-4365
Fax: 307-877-2903

From: Jon Walker [mailto:jon.walker@wyo.gov]
Sent: Tuesday, February 27, 2018 10:01 AM
To: Murdock, Jason <Jason.Murdock@pacificorp.com>
Subject: [INTERNET] AQD Question

**** STOP. THINK. External Email ****

Jason,

Has the apron of the north ash pond also been hydroseeded? Only pictures of the south ash pond are shown in the Exceptional Event package.

Thank you,
Jon

Jon Walker, P.E. | WDEQ Air Quality Engineer | Office: 307-335-6960 | Cell: 307-349-0006 | jon.walker@wyo.gov

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Appendices

Appendix A	Fugitive Dust Plan and Additional Compliance Information
Appendix C	Unit #3 ESP Information
Appendix B	Site Operator Log, Water Truck Logs, and Email Correspondence
Appendix C	Photographs

2.2. Conceptual Model

As mentioned above, the PacifiCorp Naughton Power Plant operates an instrumented 50-meter meteorological tower adjacent to a continuous particulate matter (PM₁₀) Met One Beta Attenuation Mass (BAM) monitor. Meteorological data are collected by a data acquisition system (DAS) that uses one-second data values to compute and store 5-minute and hourly averages of temperature, delta-temperature, horizontal wind speed (scalar), wind direction (unit vector), sigma theta of wind direction, vertical wind speed, solar radiation, net radiation, precipitation. Figure 2.3 presents a Google Earth map showing the location of the meteorological tower and ambient monitoring station in relation to the plant as well as the locations of the mine and ash ponds.

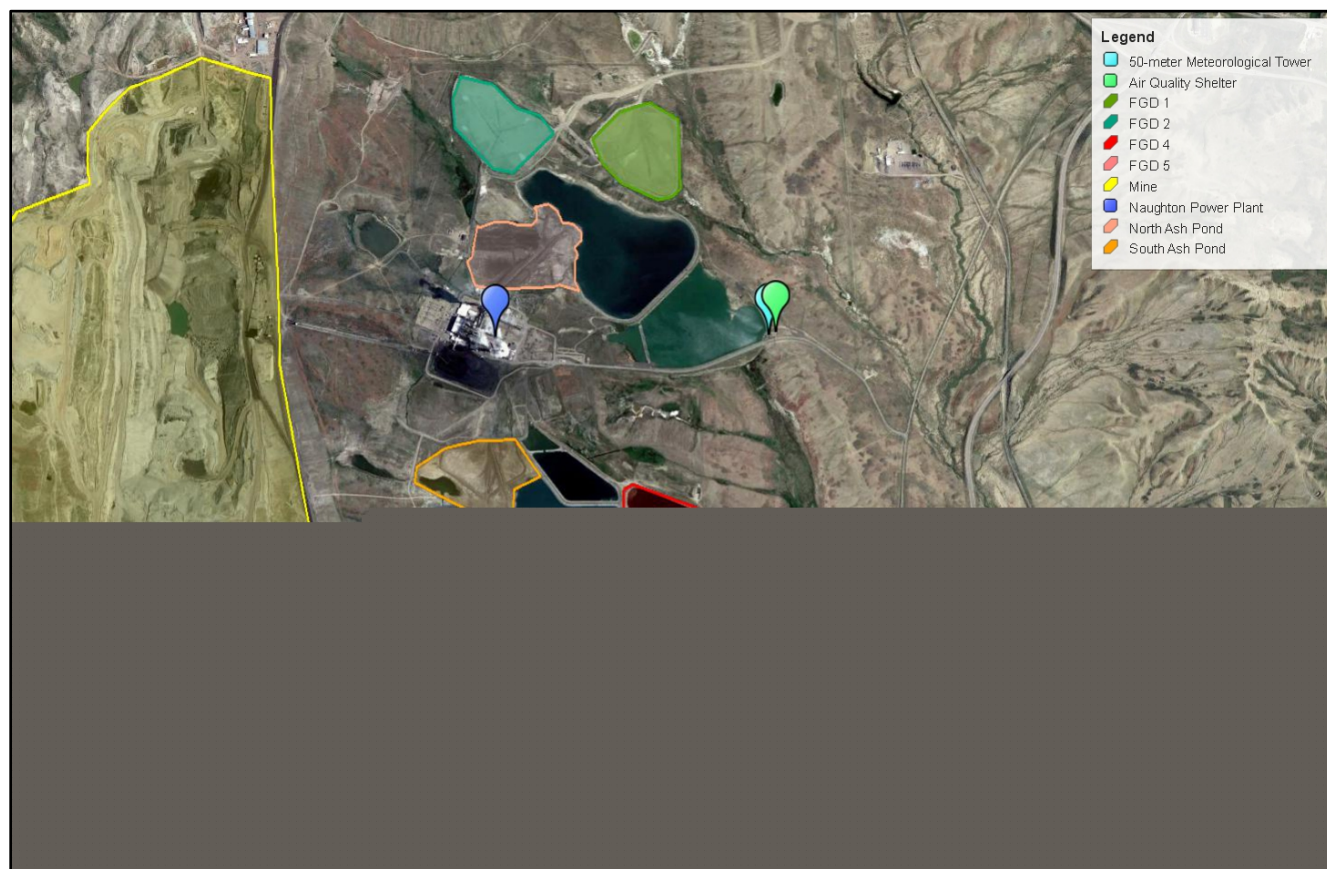


Figure 2.3 Naughton Meteorological Tower and Monitoring Shelter Location

The December 7, 2017 event was the only exceedance of the 24-hour PM₁₀ standard measured at the Naughton monitoring site during the 2017 monitoring year. Nine of the top ten 24-hour concentrations measured in 2017 occurred in the fourth quarter with the second highest 24-hour concentration of 135.4 µg/m³ measured on December 13, 2017. Figure 2.4 presents a chart of the 24-hour concentrations measured throughout the fourth quarter. The chart shows that the 24-hour concentration measured on December 7, 2017 was an outlier for the quarter. There were no known breakdowns or operational events at the plant that would trigger exceptionally high particulate emissions.

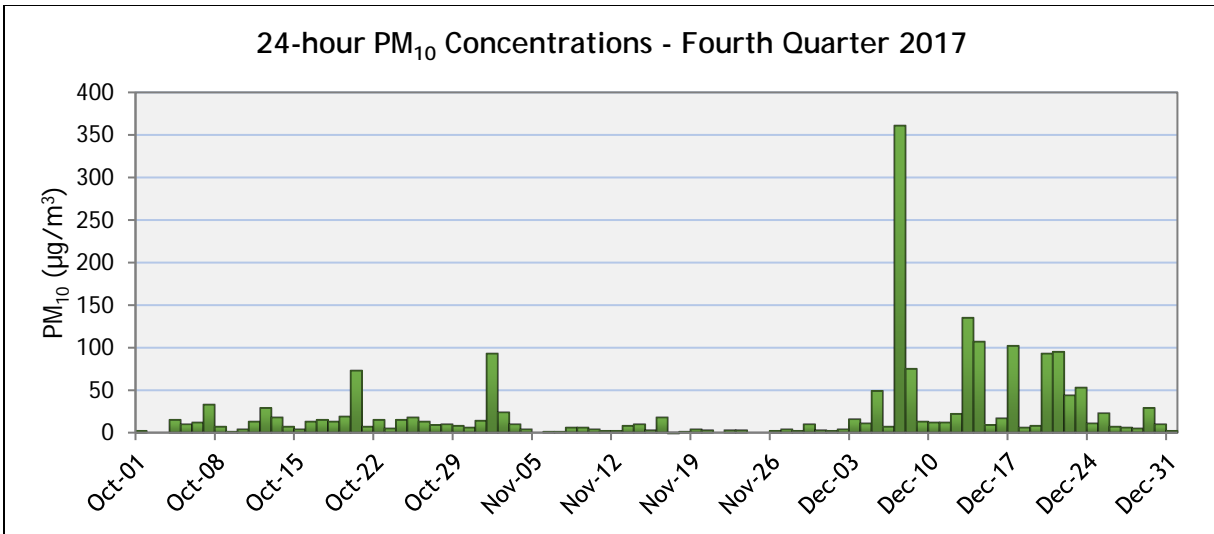


Figure 2.4 24-Hour PM₁₀ Concentrations - Fourth Quarter

A summary of the meteorological conditions at the site is presented in Table 2-3 and provides a comparison of the December 7 event to December 2017 and historical conditions observed in December over the past five years. Surface measurements are presented here due to the nature of the primary emission sources of PM₁₀ being surface-based ash ponds and coal piles. For comparison, the same data are provided for the day of the exceedance event on December 7, 2017. As can be seen from Table 2-3, the daily average wind speed, in meters per second (mps) on December 7, was approximately 30 percent higher than the December 2017 average wind speed and approximately 57 percent higher than a typical December. The maximum wind speed and the peak gust recorded on December 7 were less than peak values observed over the past five Decembers. However, precipitation recorded in December 2017 was much lower than an average December.

Table 2-3 Surface Meteorological Data Summary from Naughton Tower

Statistic	December 7, 2017	December 2017	December (2013-2017)
10-meter Scalar Wind Speed			
Average	7.7 mps	5.8 mps	4.9 mps
Maximum	15.0 mps	15.1 mps	16.1 mps
Peak Gust	20.0 mps	25.4 mps	26.7 mps
2-meter Ambient Temperature			
Average	-6.6°C	-3.0°C	-6.4°C
Maximum	-2.9°C	4.3°C	8.7°C
Minimum	10.9°C	-18.4°C	-31.3°C
Relative Humidity			
Average	62%	59%	69%
Maximum	72%	92%	95%
Minimum	51%	15%	15%
Precipitation			
Total	0.00"	0.03"	1.90" (0.38" annual avg.)

Figures 2.5 through 2.7 present windroses for the day of the event (December 7, 2017), December 2017, and historical December wind conditions for the past five years (2013-2017). The windroses show a contrast of the wind patterns observed throughout the month versus the day of the PM₁₀ event. On December 7, 2017, the winds were predominantly out of the west-northwest with approximately 29 percent or 8 hours having wind speeds greater than 10 mps (22.4 mph). In comparison, 8.7 percent of wind speeds were greater than 10 mps in December 2017 making December 7 windier than normal. As previously shown in Figure 2.3, the north ash pond and mine are the predominant wind erosion sources that were upwind of the monitoring site during the wind event.

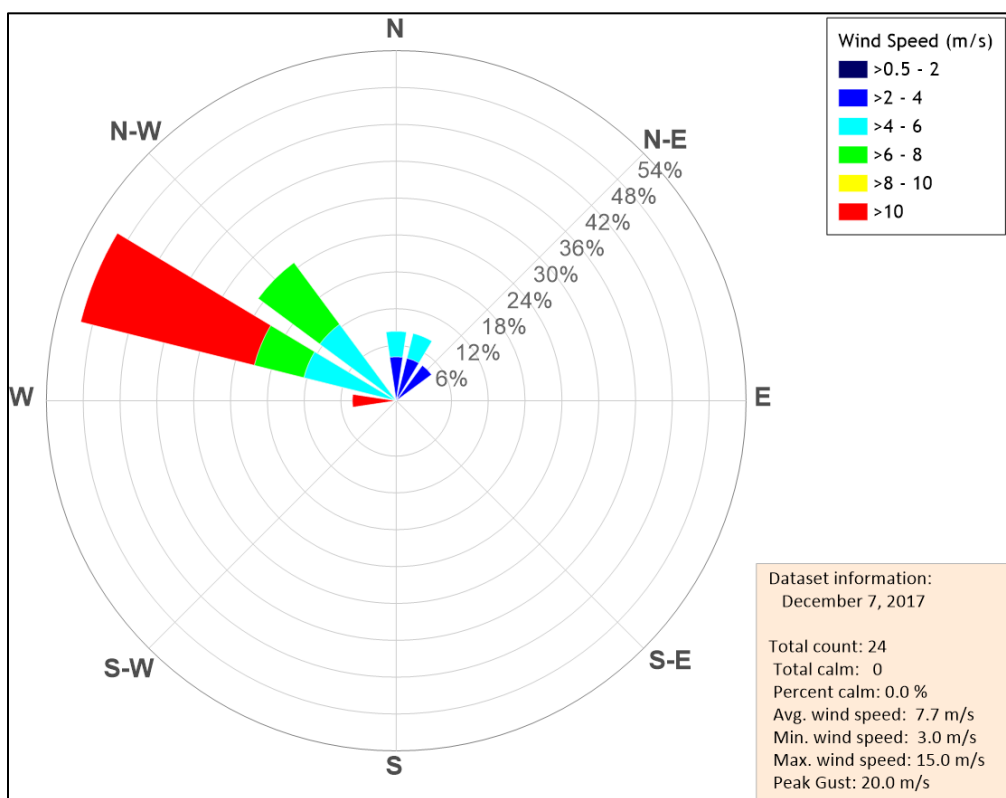


Figure 2.5 10-meter Level Windrose for December 7, 2017

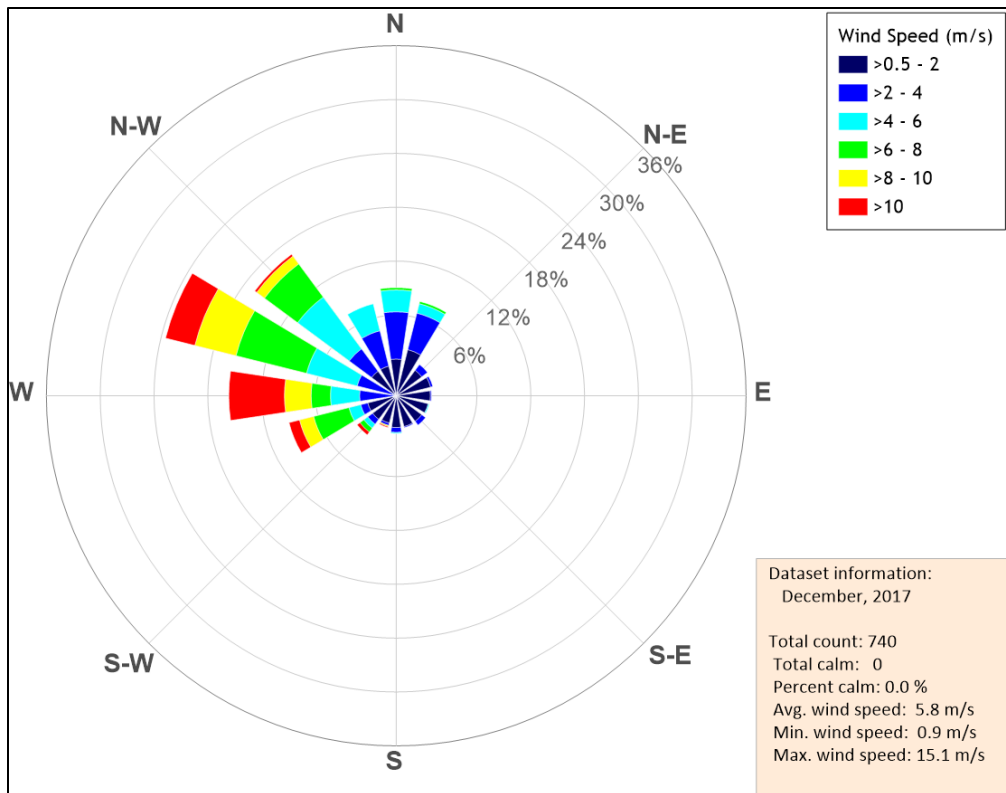


Figure 2.6 10-meter Level Windrose for December 2017

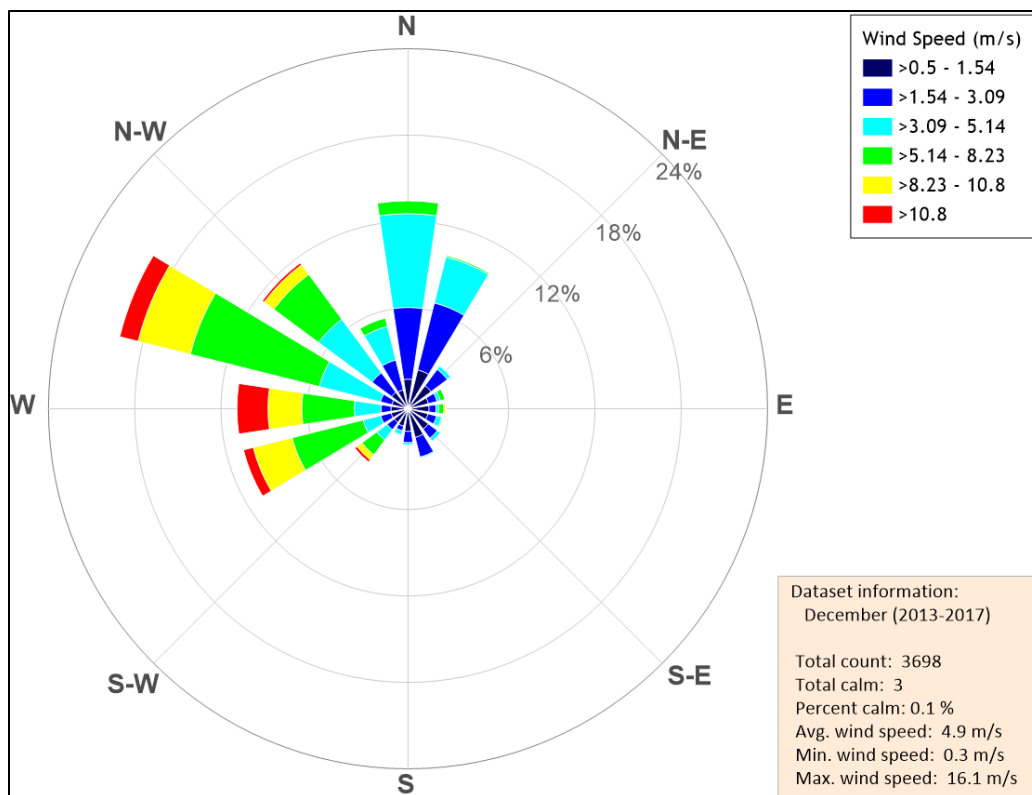


Figure 2.7 10-meter Level Windrose for December 2013-2017

Figure 2.8 presents the 5-minute meteorological and hourly PM₁₀ data observed at the monitoring site on December 7, 2017. The green bars in Figure 2.8 represent the hourly PM₁₀ concentrations measured at the ambient air quality site; the solid blue line represents the five-minute sustained wind speeds and the dotted line represents the maximum gust measured during each five-minute period. As shown in the figure, hourly elevated concentrations started during the 10:00 Mountain Time (MT) observation and corresponded with sustained wind speeds above 10 mps. Hourly PM₁₀ concentrations remained above 150 µg/m³ through 18:00 MT and decreased during 19:00 and 20:00 hours when wind speeds fell below 10 mps. Later in the evening, the PM₁₀ concentration again exceeded 150 µg/m³ during 21:00 and 22:00 hours when wind gusts peaked above 10 mps. Particulate data collected on December 7 shows the maximum concentrations measured between 10:00 and 18:00 MT were 985 µg/m³ which is the BAM's upper limit for the instrument. Although this concentration may indicate an issue with the monitoring equipment, photographic, meteorological, and observational data indicate that the concentrations measured by the BAM were not due to a sampler malfunction but were caused by an extended period of high winds.

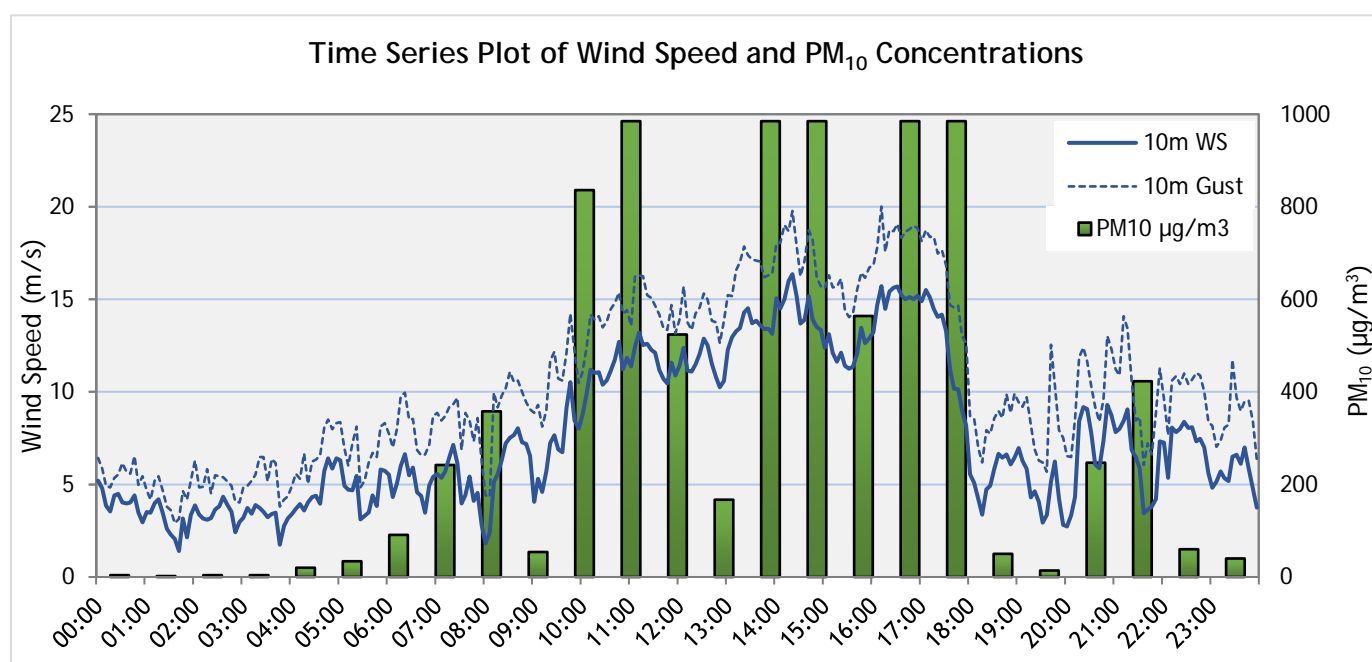


Figure 2.8 Time Series Plot of 5-minute Wind Speed and Hourly PM₁₀ Concentrations

As previously mentioned, the 24-hour concentration for December 7, 2017 was 360.8 µg/m³. Historically, this is an exceptionally high concentration for this site. Figure 2.9 presents the maximum daily PM₁₀ concentrations for each year and the number of days that exceeded the 24-hour PM₁₀ NAAQS and WAAQS value of 150 µg/m³. The chart shows that, including December 7, 2017, there have only been two exceedances of the 24-hour standard in the past five years indicating that exceedances of the PM₁₀ standards is not routine and likely not to reoccur. Removal of the December 7, 2017 event would reduce the 2017 high value from 360.8 µg/m³ to 135.4 µg/m³.

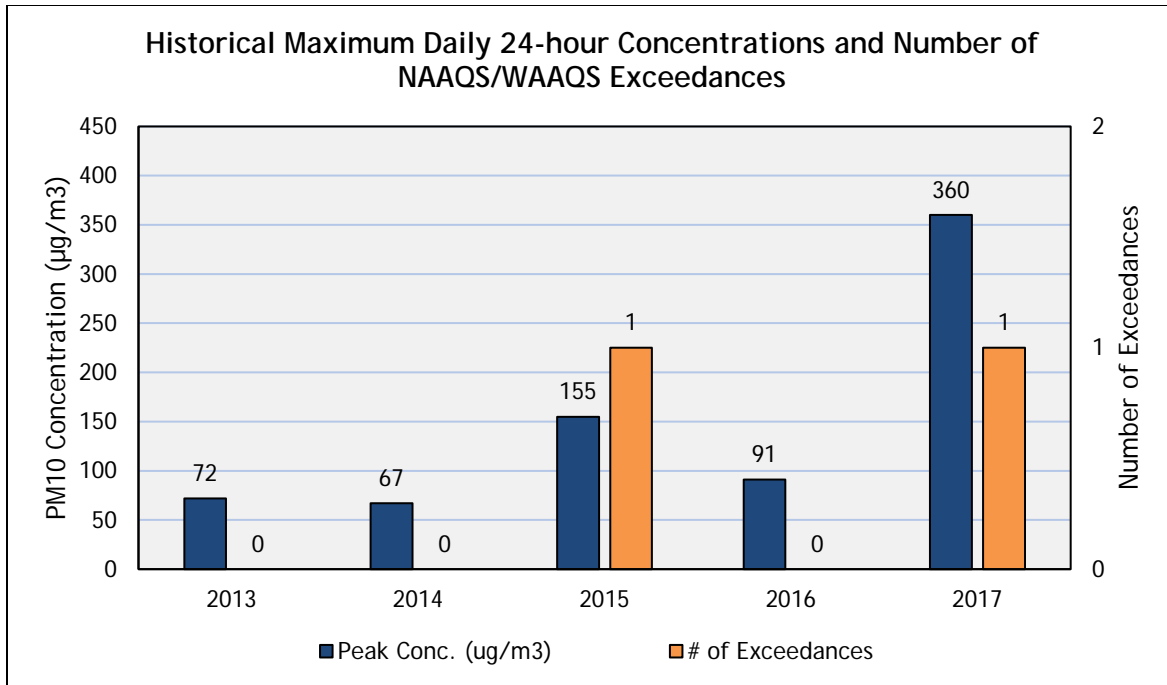


Figure 2.9 Historical Maximum Daily 24-hour PM₁₀ Concentrations and Number of NAAQS/WAAQS Exceedances at Naughton Monitoring Station

APPENDIX A: FACILITY FUGITIVE DUST COMPLIANCE PLAN AND ANDDDITIONAL COMPLIANCE INFORMATION



Naughton Power Plant



December 9, 2014

P.O. Box 191 * Kemmerer, Wyoming 83101

Steven A. Dietrich, Administrator
Wyoming Dept. of Environmental Quality
Air Quality Division
Herschler Building
122 West 25th Street
Cheyenne, WY 82002

**RE: PacifiCorp – Naughton Plant – Kemmerer, WY: Updated Fugitive Dust Compliance Plan,
Revision 4**

Dear Mr. Dietrich:

Enclosed are three copies of an updated fugitive dust compliance plan for the Naughton Power Plant. The updated fugitive dust compliance plan is provided for inclusion in Naughton Title V operating permit 3-2-121. Please contact Jason Murdock at (307) 828-4365 if you have any questions or require additional information regarding this plan.

Sincerely,

Shawn Smith
Naughton Plant Managing Director

Enclosure (three copies)

Cc: Greg Meeker – Wyoming DEQ, District Engineer (w/enclosure)
Brian Fehr – Wyoming DEQ, Operating Permitting Program (w/o enclosure)
Jim Doak – NTO
Brett Shakespear – NTO

Document Type:	PLANT POLICIES & PROCEDURES			Document ID Number:	ENV-04
Department:	Environmental			Review Date:	12/09/2014
SUBJECT:	Fugitive Dust Compliance Plan			Reviewed By:	Jason Murdock
Approved By:	Plant Management	Date:	12/09/2014	Next Review Date:	During Title V Renewal

Revision Number	Reason for Revision	Date	MOC #
1	Added language concerning dust control on ash pond	9/2013	N/A
2	Addressed Wyoming DEQ comments	12/2013	N/A
3	Addressed management comments	2/2014	N/A
4	Revised section 5.0	12/2014	N/A

1.0 PURPOSE:

- 1.1 This document formalizes fugitive dust mitigation efforts for the Naughton Power Plant. The purpose of this policy is to ensure compliance with applicable State and/or Federal fugitive dust regulations.

2.0 SAFETY AND ENVIRONMENTAL CONSIDERATIONS:

- 2.1 Fugitive dust emissions at Naughton Power Plant are subject to standards set forth in the Wyoming Air Quality Standards and Regulations (WAQSR) and the Naughton Plant Title V Air Quality Operating Permit.
- 2.2 Following are areas and activities that have been historically identified with fugitive dust emissions at Naughton:
- 2.2.1 Coal pile, coal delivery and other coal pile-related operations.
 - 2.2.2 Dry portions of ash ponds and bare earth areas.
 - 2.2.3 Plant roadways.
 - 2.2.4 Ash unloading areas.
 - 2.2.5 Landfill operations.
 - 2.2.6 Miscellaneous activities, i.e. construction, hauling, overhauls, etc.
 - 2.2.7 Pollution control device malfunctions.
- 2.3 Fugitive source opacity emissions are measured by certified EPA Method 9 observers. Applicable fugitive source opacity emission limits are listed in the Naughton plant Title V air operating permit.

- 2.4 A PM₁₀ 24-hour ambient monitor is located east of the Naughton plant's north Clearwater pond. The ambient monitor's location east of the Naughton plant's north Clearwater pond assures that the monitor will measure ambient air from multiple background sources and areas, including the area of the plant. The information from this monitor (in conjunction with other factors) will be used to help determine when corrective action is required.

Note: Emissions from baghouse vents are considered "point source emissions" and are addressed individually in the Naughton Title V Air Quality Operating Permit.

3.0 RESPONSIBILITY:

- 3.1 The Plant Manager bears ultimate responsibility for compliance with all regulatory requirements
- 3.2 The Shift Supervisor is responsible for initiation of fugitive dust corrective measures. The Shift Supervisor is responsible for providing detailed documentation of information regarding the fugitive emission source, reason for deviation from this plan and resulting corrective actions.
- 3.3 The Maintenance Superintendent is responsible for ensuring that all maintenance activities are conducted in accordance with the provisions of this document and other applicable regulatory requirements.
- 3.4 The Plant environmental personnel provide regulatory guidance and oversight. Various periodic inspections and observations, as required by the Title V Air Quality Operating Permit will be performed under the direction of Naughton plant environmental personnel.
- 3.5 The day shift Operations Supervisor is responsible for ensuring that all dust suppression activities conducted by equipment operators is documented and to ensure that suitable maintenance of the mobile dust suppression equipment is performed.
- 3.6 Operators are responsible for operating any dust suppression equipment and ensuring activities are documented. Equipment Operators shall document **any** use of the mobile dust suppression equipment with respect to dust suppression activities by filling out the dust suppression log (Attachment A).
- 3.7 Maintenance personnel are responsible for maintaining dust suppression equipment (i.e., water cannons, foam dust suppression systems, baghouses, water trucks, etc.) and ensuring activities are documented.
- 3.8 Contractors are required to adhere to the fugitive dust compliance plan.

4.0 GUIDELINES AND PROCEDURES:

4.1 Operations

Mitigation of fugitive dust emissions and associated corrective action is largely dependent upon the source of the dust. Appropriate and effective mitigation is contingent upon the discretion and judgment of the Shift Supervisor, particularly during low ambient temperature and/or high wind periods. If fugitive dust emission is observed, the Shift Supervisor or control room operator shall be notified so that appropriate corrective action can be initiated. All corrective actions shall be documented and reported to the environmental department.

The following sections give general guidelines to control fugitive emissions with respect to the facility's major sources.

4.1.1 Coal Pile

Persons observing fugitive dust emissions from the coal pile shall initiate appropriate corrective action. The Shift Supervisor shall be notified so that appropriate corrective action can be initiated.

4.1.1.1 Coal Handling

Wyoming DEQ/Air Quality Division has specifically requested that heavy equipment operators operate mobile coal pile equipment at velocities which will minimize fugitive dust emissions and ensure compliance with applicable regulatory limits. Depending upon ambient conditions, coal pile activity may be curtailed or terminated to ensure compliance with the fugitive dust opacity standard.

4.1.1.2 Sealants

As the coal pile physical boundary is historically transient in nature, sealants will be applied to undisturbed areas of the coal pile as necessary. Undisturbed areas include the sides, rear and slope areas as well as the apron portion of the coal pile.

4.1.1.3 Water Cannons

Stationary water cannons are mounted in positions designed to provide coverage of the coal pile when fugitive dust emissions are observed. During periods of winds exceeding 25 mph for 15 continuous minutes, the coal pile should be inspected for fugitive dust emissions. If fugitive dust emissions are observed, a decision on whether or not to take corrective action should be made and documented. If a decision is made to take corrective action and ambient air temperatures are above 40°F, the coal pile water

cannon system shall be activated to address any fugitive dust. Additionally, the control room operator may activate the water cannon system during other dusty conditions when temperatures are above 40°F. The Shift Supervisor (or plant management) will determine the duration that the water cannons shall remain activated to control fugitive dust emissions.

When plant management receives information that the forecasted weather report indicates the possibility of high winds (25 mph or greater), Naughton plant management shall evaluate if the coal pile should be watered before the forecasted wind event occurs.

4.1.1.4 Surfactants/Wetting Agent

Surfactants/wetting agents are applied to the incoming coal stream when ambient temperatures are above 20°F. When coal is being received this system shall remain in service except when ambient temperatures are below 20°F (per historical operating experience). If the system malfunctions during temperatures above 20°F, the Shift Supervisor or control room operator shall be notified so that appropriate corrective action can be initiated.

4.1.1.5 Stacker Chute

The chute skirting shall be in contact with the coal pile whenever coal is being received. If the chute skirting is not in contact and/or fugitive dust emissions from stacker chute operations are observed, the Shift Supervisor or control room operator shall be notified so that appropriate corrective action can be initiated.

4.1.2 Ash Ponds

Fugitive dust emissions from the ash pond areas shall be documented on the daily Operations Environmental Checklist and reported immediately to the Shift Supervisor. Dry portions of the ash ponds shall be reclaimed, inundated with water or treated with a sealant/surfactant.

4.1.2.1 Sealants

4.1.2.2 Sealants will be applied to any unclaimed dry areas when deemed necessary by plant management for the purpose of preventing or controlling fugitive dust emissions from the ash ponds. Sealants will be applied at a minimum frequency of two times per year separated by at least 3 months.

Suppressant

Dry areas will receive a water application with the water truck as needed basis in order to mitigate dusting. During unusually dusty

periods and in areas where the potential for dusting may be severe, dry areas will be watered and the activity documented.

4.1.3 **Plant Roads**

During unusually dusty periods and in areas where the potential for dusting may be severe, roads will be watered as needed to achieve appropriate dust abatement and the activity shall be documented.

4.1.4 **Loading/Unloading Operations**

Loading/unloading activities shall be conducted such that emissions from truck beds, silo chutes, vents, etc. are minimal and do not exceed the applicable 20% opacity limit. Activities shall be moderated or curtailed and truck speeds reduced, as necessary, to prevent exceedances of the emissions standard.

4.1.5 **Ash Silo/Baghouses**

Provisions of the Naughton Air Quality Title V Operating Permit require that any observed emissions from the ash silo and/or baghouses be reported to the Shift Supervisor so that corrective action is initiated immediately.

4.1.6 **Landfill Operations**

Landfill operations often result in fugitive emissions during hauling, compacting and covering activities. Operators shall mitigate emissions by reducing mobile equipment velocity and curtailing activities during windy conditions. If fugitive emissions are observed, the water truck shall be used to control fugitive dust emissions.

5.0 **Monitoring and Measurement**

Plant operators shall document and record fugitive dust emissions during their daily inspections on the Operations Daily Environmental Checklist. Upon observation of emissions/malfunctions, the operator shall initiate appropriate notification (Shift Supervisor, environmental personnel, etc.), corrective action (work notifications, etc.) and document any corrective actions taken. Shift Supervisors shall also provide documentation of fugitive dust observations to plant environmental personnel. During periods of winds exceeding 25 mph for 15 continuous minutes, a fugitive dust inspection of the coal pile, ash ponds and roads should be initiated within one hour and documented. If fugitive dust emissions are observed, a decision on whether or not to take corrective action should be made and documented.

As all employees share the responsibility for regulatory compliance and procedural conformance, any employee observing fugitive dust emissions or excessive dusting conditions shall notify the Shift Supervisor and/or environmental personnel immediately.

When printed, this document is uncontrolled and for reference only

Rev: #4
Revised: 12/2014

Operation and maintenance of the continuous PM₁₀ monitoring system is conducted by Naughton plant Instrument and Control personnel. A PM₁₀ ambient emissions monitor signal is provided to the control room for data and fugitive dust control actions. The Honeywell computer will initiate an alarm when the PM₁₀ value exceeds (150 ug/m³) on an hourly average basis. This alarm (in conjunction with other factors) will be used to determine when a corrective action is required. When the hourly PM₁₀ value of 150 ug/m³ is exceeded, Naughton personnel will (within the next hour) inspect the fugitive dust sources at the facility to determine if visible emissions are present from any of these sources. If visible emissions are noted and the reading from the ambient emissions monitor is still above the programmed alarmed value the following hour, Naughton personnel shall initiate dust suppressant mitigation procedures or shutdown the fugitive dust sources as necessary to control fugitive dust. If during a fugitive dust incident normal corrective action cannot be implemented due to low ambient temperature, equipment malfunction, etc.; such information shall be documented in detail and provided to environmental personnel.

Emission observations of the coal pile area, ash ponds area, coal transfer points, conveyors, coal handling system and ash silo area are conducted by plant personnel.

6.0 Maintenance and Preventive Action

The breakdown or malfunction of any equipment used for fugitive dust suppression or fugitive dust emissions monitoring purposes (water truck, water cannons, dust suppression system, PM₁₀ ambient monitoring system, baghouses, etc.) shall initiate immediate corrective action via an emergency work notification and callout, if necessary. Malfunctions warrant regulatory reporting as mandated by the Title V operating permit. All malfunctions must be communicated promptly to environmental personnel so that appropriate documentation and regulatory reporting can occur.

7.0 Reporting and Recordkeeping

Quarterly PM₁₀ ambient monitoring reports are prepared by environmental personnel and submitted to Wyoming DEQ, Air Quality Division prior to the end of the first month following the completion of each quarter. The Naughton Air Quality Title V Operating Permit mandates a semi-annual report detailing and certifying compliance with the requirements regarding visual observations, maintenance of dust collection/suppression systems and deviations from the provisions of the Operating Permit. Additionally, annual reporting is provided to the DEQ and EPA wherein the Plant Manager is required to certify compliance or non-compliance with all of the provisions of the Title V Air Quality Operating Permit. Environmental personnel normally prepare and submit these reports. All records will be retained for a minimum of 5 years.

8.0 REFERENCES

- 5.1 Naughton Plant Title V/Section 30 Air Quality Operating Permit
- 5.2 Wyoming Air Quality Rules and Regulations

Attachment A



DUST SUPPRESSION LOG NAUGHTON POWER PLANT All Dust Suppression Related Activities Must be Logged

Date	Start Time	End Time	Operators Name (Print)	Hauled* W = Water Only DC = Dust Chemical	Number of Loads	Est. Amount per Load (gallons)	Area Watered / Comments CP = Coal Pile; PLR = Plant Roads; PDR = Pond Roads NAP = North Ash Pond Apron; SAP = South Ash Pond Apron

*Fill Out Separate Lines for each Material Hauled

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Rev: #4
Revised: 12/2014

Foam Suppression: 0 = No Flow / 1 = Flow
 Water Cannon State: 0 = Manual / 1 = Auto
 Water Cannon Running: 0 = No / 1 = Yes

Naughton Coal Pile Fugitive Dust System

Date/Time	Coal Belt Mine Scale (Tons)	Foam Dust Suppression	Water Cannon State	Water Cannon Operation	Ambient Temp (F)	Wind Speed (MPH)
07-Dec-17 00:00:00	883.2	0	0	0	17.1	10.7
07-Dec-17 01:00:00	882.6	0	0	0	16.3	10.7
07-Dec-17 02:00:00	880.7	0	0	0	16.5	16.7
07-Dec-17 03:00:00	180.1	0	0	0	15.8	25.0
07-Dec-17 04:00:00	0.3	0	0	0	15.6	22.2
07-Dec-17 05:00:00	0.3	0	0	0	15.6	28.0
07-Dec-17 06:00:00	0.3	0	0	0	15.7	30.9
07-Dec-17 07:00:00	24.1	0	0	0	16.3	27.1
07-Dec-17 08:00:00	649.2	0	0	0	16.9	28.4
07-Dec-17 09:00:00	809.8	0	0	0	18.8	30.2
07-Dec-17 10:00:00	50.5	0	0	0	21.5	30.3
07-Dec-17 11:00:00	0.3	0	0	0	23.0	32.5
07-Dec-17 12:00:00	0.3	0	0	0	25.6	28.0
07-Dec-17 13:00:00	0.3	0	0	0	27.1	33.7
07-Dec-17 14:00:00	0.3	0	0	0	27.3	37.6
07-Dec-17 15:00:00	0.3	0	0	0	26.7	34.8
07-Dec-17 16:00:00	0.3	0	0	0	25.4	36.0
07-Dec-17 17:00:00	0.3	0	0	0	24.4	33.0
07-Dec-17 18:00:00	0.3	0	0	0	24.0	24.4
07-Dec-17 19:00:00	0.3	0	0	0	23.7	25.6
07-Dec-17 20:00:00	70.4	0	0	0	22.8	32.2
07-Dec-17 21:00:00	480.6	1	0	0	22.7	36.8
07-Dec-17 22:00:00	0.3	0	0	0	23.4	34.2



NAUGHTON OPERATIONS ENVIRONMENTAL CHECKLIST

Must be completed daily / all questions must be answered. Indicate locations/equipment that needs to be addressed.

Operator: Jesse Owens

Operator Signature: [Signature]

Date: 12/7/12

ITEM	CIRCLE STATUS	COMMENTS	W/O # - Corr. Action
Ash Ponds Any signs of oil floating on the ponds? Oil booms present and in good shape? Is there any floating solids, oil sheen or foam in the outfall discharge? (Inspect for signs that might indicate chemicals or high concentrations may have been discharged from the pond) Fugitive Dust Issues? (If so, indicate which pond has issues and notify Shifter)	Yes / <u>No</u> <u>Yes</u> / No Yes / <u>No</u> Yes / <u>No</u>	Insp. Start Time: <u>07:53</u>	Insp. Stop Time: <u>08:17</u>
FGD Ponds 1 & 2 Fugitive Dust Issues? (If so, indicate which pond has issues and notify Shifter)	Yes / <u>No</u>	Insp. Start Time: <u>07:49</u>	Insp. Stop Time: <u>07:53</u>
FGD Pond 4 Bird Avert system working? (Platforms should activate when driving around pond; radar bar should be turning.) Any birds on pond? (Provide detailed documentation in bird logbook of hazing actions) Fugitive Dust Issues? (If so, notify Shifter)	<u>Yes</u> / No Yes / <u>No</u> Yes / <u>No</u>	Insp. Start Time: <u>08:37</u>	Insp. Stop Time: <u>08:40</u>
FGD Pond 5 Bird Avert system working? (Platforms should activate when driving around pond; radar bar should be turning.) Any birds on pond? (Provide detailed documentation in bird logbook of hazing actions) Fugitive Dust Issues? (If so, notify Shifter)	Yes / <u>No</u> Yes / <u>No</u> Yes / <u>No</u>	Insp. Start Time: <u>08:29</u> <u>Waiting for Installation</u>	Insp. Stop Time: <u>08:32</u>
Oil / Chemical Vessels Any visible signs of "fresh" liquid? (On or around fuel tanks, chemical tanks, transformers.) Secondary containments in good shape? (Check for cracks, debris, corrosion, available capacity, etc.)	Yes / <u>No</u> <u>Yes</u> / No		

ITEM	CIRCLE STATUS	COMMENTS	W/O # - Corr. Action
Storm Water Any visible signs of "fresh" liquid or stains in the landfill, switchyard (outside of fence) or laydown yard? (i.e. oil or chemical) Yes / <u>No</u> Any signs of erosion? Yes / <u>No</u> Any leaks or spills that need to be addressed? (i.e. oil, ash, etc.) Yes / <u>No</u> Do storm water transfers from around the transformers need to be made? (Notify Environmental Department before transfer made.) Yes / <u>No</u>			
Landfill Gate locked and secure? <u>Yes</u> / No Fence in good shape? <u>Yes</u> / No Litter outside fenced area? Yes / <u>No</u>			
Fugitive Dust Coal pile transfer chute skirting contacting pile while coal is being recieved? Yes / No <u>No Coal</u> Coal Pile Dust Suppression System Working? 1 - Nozzles & Chute are free of Coal (Not Plugged) 2 - Nozzles working (not kinked, spraying on coal) 3 - Foam Quality Good (looks like foam not soap) 4 - Alarms addressed (if any) 5 - Solution Flow Rates are Correct (Low Setting: 3-5 gpm; Medium Setting: 6 - 8 gpm; High Setting: 9 - 13 gpm) - <u>Adjust with the globe valves only.</u> Coal Being Received (600 T/Hr) Yes / <u>No</u> Ambient Temp. (F) <u>140</u> Dust from coal pile? (Contact CRO to address dust) Yes / <u>No</u> Other fugitive dust problems? (Roads, soil piles, landfill, ash silo, etc.) Yes / <u>No</u>		Insp. Start Time: <u>07:41</u>	Insp. Stop Time: <u>07:43</u>
Other Environmental Concerns?:			

Any non-conformance must be addressed with work order/correction action. Please contact Env. Dept. regarding abnormal conditions. In addition, please provide detailed comments and work order #s in spaces provided.

Shifter Review:

Signature: [Signature]

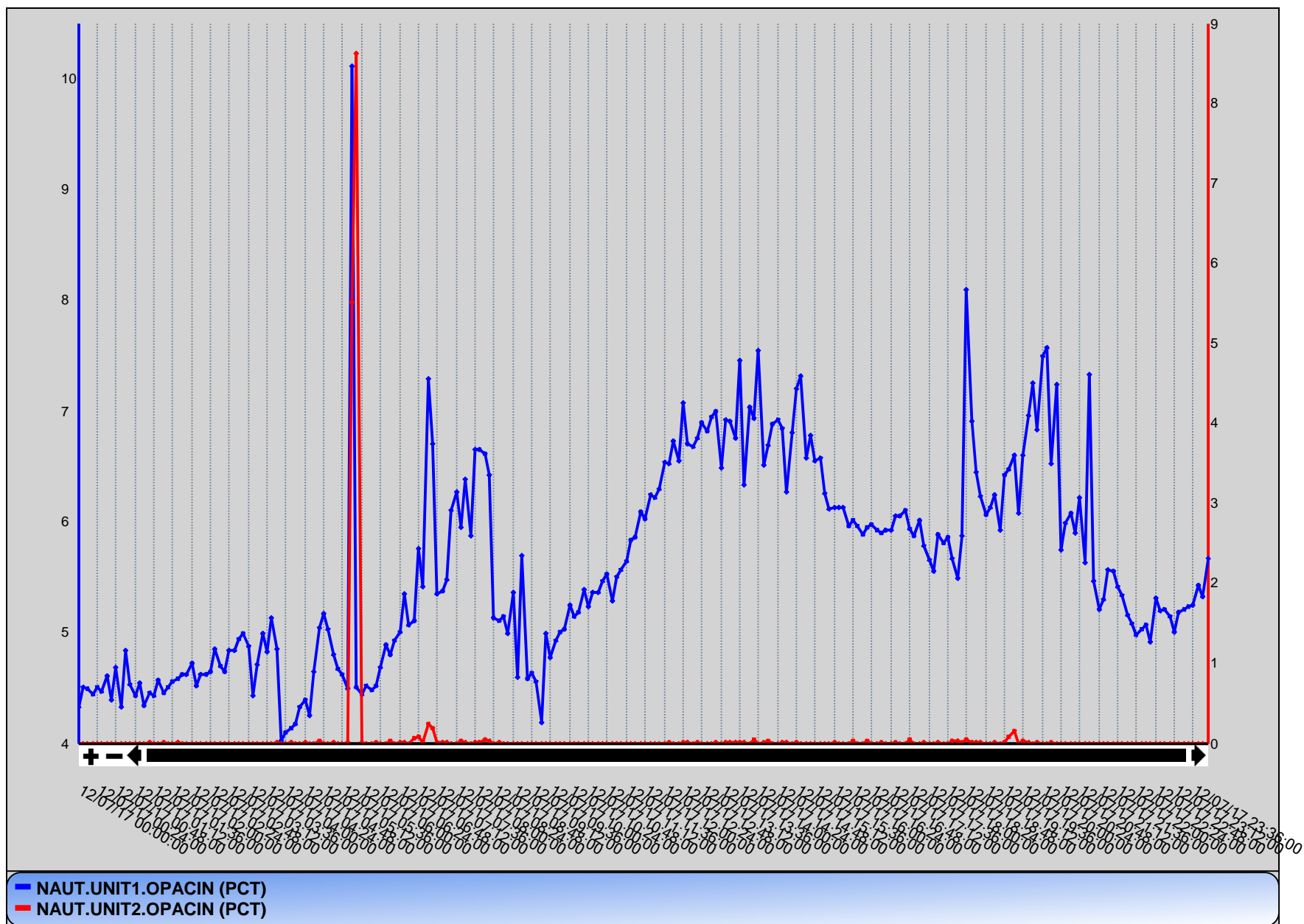
Date: 12-7-17

Environmental Dept. Review:

Initial: [Initials]

Date: 12/12/17

	Source	Parameter	Tested	Calibration Type	Reference	CEM	Error Limit	Error	Status
	UNIT2	OPACIN	12/07/2017 05:52	D - Daily	0.0000	-0.0616	4.0000	0.1000000	✓ Pass
	UNIT2	OPACIN	12/07/2017 05:55	D - Daily	27.6000	28.0020	4.0000	0.4000000	✓ Pass
	UNIT1	OPACIN	12/07/2017 05:51	D - Daily	0.0000	-0.0361	4.0000	0.0000000	✓ Pass
	UNIT1	OPACIN	12/07/2017 05:53	D - Daily	25.2000	25.0036	4.0000	0.2000000	✓ Pass





Naughton Plant Visible Emission Observation Form

Observer: Copeland

Start Time: 10:00

Facility: Naughton Plant

Date: 12-7-12

End Time: _____

Emission Point: Unit 3 Stack

Can a Method 9
Reading be taken?

☐ YES

☒ NO*

*If "NO", reason for not making an observation:

- ☐ Unit Off-Line
- ☒ Plume longer than 1 full stack length
- ☒ Excessive Wind (>25 mph)
- ☐ Converging Plumes
- ☐ Weather Conditions _____
- ☐ Other: _____

*If "YES", record observation data below:

NORTH	Observation Layout Sketch
<p>Symbols:</p> <p>⊕ Sun</p> <p>→ Wind Direction</p> <p>⌒ Stack w/ Steam Plume</p>	

Emission Point Height
Above Grd. Level:

475 ft

Plume Background:

Blue Sky

Plume Description:

Long

Plume Length:

> 15 ft

Observer Distance
from Emission Point:

2200

Wind Direction (from
Observation Pt.):

W

Wind Speed:

31 mph

Ambient Temp.:

20°

Hour	Minute	Seconds				Plume		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							

Total:

--	--	--	--

Corrective Action Check List (greater than >30% Opacity)

- 1. Env. Dept. notified ☐
- 2. ESP in service ☐
- 3. Dropped Load ☐
- 4. Other action taken (explain on separate sheet). ☐

A. Sum of totals:

--

B. # of readings:

--

C. Opacity (A/B):

--

Shift Supervisor Signature (required if Shift Supervisor is NOT observer)

Observers Signature

Naughton Plant – Dust Collector Method 22 Visible Emissions Form

Print Name Jesse Owens Signature [Signature] Date 12/7/17

BAGHOUSE OPERATIONAL STATUS - Visual emission observation required if boiler or coal belt is operating.

- Choose a location with a clear view of the emission point.
- Try to pick a spot where the sunlight is not shining directly into your eyes.
- Observe the emission against a contrasting background.
- When other emissions interfere, stop and begin observations again when there is a clear view.
- Each observation period must be a minimum of one minute in duration.
- **If emissions are observed:**
 - Shifter needs to conduct a Method 9
 - A notification must be written.

% Cloud Cover:	<u>5</u>	Est. Wind Velocity (mph):	<u>10-15</u>
Precipitation (Y/N):	<u>N</u>	Wind Direction:	<u>East</u>

Dust Collector or Baghouse →	Coal Stockpile Reclaim Tunnel	#1 Coal Bunker Baghouse Vent	#2 Coal Bunker & Gallery	#3 Coal Bunker & Gallery
✓ In Service	✓	✓	✓	✓
✓ Out of Service				
✓ Boiler or coal belt operating	✓	✓	✓	✓

OBSERVATIONS

- Indicate observer position relative to dust collector or baghouse exhaust: X
- Indicate location of the sun relative to the position of the observer: ●

Start Time hours/minutes/seconds	<u>07:37</u>	<u>09:15</u>	<u>09:12</u>	<u>09:08</u>
End Time hours/minutes/seconds	<u>07:39</u>	<u>09:17</u>	<u>09:14</u>	<u>09:10</u>
Observation Period Duration minutes/seconds	<u>2.0</u>	<u>2.0</u>	<u>2.0</u>	<u>2.0</u>
Visible Emissions (Y/N)	<u>N</u>	<u>N</u>	<u>N</u>	<u>N</u>
Emission Time Duration minutes/seconds	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
Notification #	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
Dust Collector Exhaust →	<div style="text-align: center;"> <input type="checkbox"/> X ● </div>	<div style="text-align: center;"> ● <input type="checkbox"/> X </div>	<div style="text-align: center;"> <input type="checkbox"/> ● X </div>	<div style="text-align: center;"> <input type="checkbox"/> ● X </div>
Comments:				

Naughton Plant – Dust Collector Method 22 Visible Emissions Form

Dust Collector or Baghouse	Fly Ash Loadout Silo	Mine Conveyor East Transfer Point (PEC)	Unit 1 / 2 Scrubber Lime Silo Baghouse
√ In Service		✓	
√ Out of Service	✓		✓
√ Hydro		N/A	N/A
OBSERVATIONS <ul style="list-style-type: none"> Indicate observer position relative to dust collector or baghouse exhaust: X Indicate location of the sun relative to the position of the observer: ● 			
Start Time hours/minutes/seconds		08:47	
End Time hours/minutes/seconds		08:49	
Observation Period Duration minutes/seconds		2	
Visible Emissions (Y/N)		N	
Emission Time Duration minutes/seconds		—	
Notification #		—	
Dust Collector Exhaust →	<input type="checkbox"/>	<input type="checkbox"/> X ●	<input type="checkbox"/>
Comments:			

- Completed visual observation forms are to be signed by on-duty Shift Supervisor or Plant Representative.
- The Shift Supervisor is to be notified of any visual emission observations, ASAP.
- Completed forms are to be delivered to Environmental Dept. for recordkeeping.

Shift Supervisor/ Plant Representative:

Date:

12-9-17

APPENDIX B: UNIT #3 ESP INFORMATION

Pacificorp - Naughton Station
T/R Voltages, Currents and KW's
Hourly Averages for : 12/07/2017

TR1A TR1AA TR1B TR1C TR3AA TR2A TR2AA TR2B TR2C TR3A

Hour	VS (KV)	35.2	32.4	25.7	30.6	31.1	33.8	26.4	31.0	29.1	29.6
0	IS (mA)	474	343	519	641	1,362	375	289	962	605	750
	VP	366	264	234	293	317	327	228	289	270	263
	IP	57	41	65	78	164	44	34	121	72	95
	SPARK	1	0	3	1	0	4	5	0	4	0
	KW	17	11	13	20	42	13	8	30	18	22
TOTAL KW		194 KW	North		104 KW	South		91 KW			

Hour	VS (KV)	34.8	33.6	26.1	31.1	31.3	33.5	27.3	31.2	30.4	29.4
1	IS (mA)	467	394	554	670	1,395	326	308	968	661	744
	VP	362	286	240	299	320	318	241	292	288	262
	IP	56	47	70	82	169	38	36	122	78	94
	SPARK	1	0	3	1	0	4	5	0	4	0
	KW	16	13	14	21	43	11	8	30	20	22
TOTAL KW		199 KW	North		108 KW	South		92 KW			

Hour	VS (KV)	34.8	32.4	25.4	30.9	31.0	34.8	26.1	31.0	29.4	29.1
2	IS (mA)	476	395	511	677	1,374	421	286	987	600	727
	VP	363	271	230	297	316	342	224	290	273	257
	IP	58	48	64	83	166	50	33	124	72	92
	SPARK	1	0	3	1	0	3	5	0	4	0
	KW	17	13	13	21	43	15	8	31	18	21
TOTAL KW		199 KW	North		107 KW	South		92 KW			

KW Total 3 Hour AVG 198 KW North 106KW South 91KW

Hour	VS (KV)	34.4	33.6	26.1	31.4	31.1	33.8	26.6	31.2	30.1	28.9
3	IS (mA)	469	429	567	713	1,395	376	310	1,020	649	729
	VP	358	290	241	304	316	327	235	292	285	256
	IP	57	52	71	88	168	44	37	128	77	92
	SPARK	1	0	4	1	0	4	5	0	4	0
	KW	16	14	15	22	43	13	8	32	20	21
TOTAL KW		204 KW	North		111 KW	South		93 KW			

Hour	VS (KV)	34.7	32.4	25.7	30.9	30.9	33.7	26.1	31.0	29.0	29.2
4	IS (mA)	477	386	541	694	1,380	387	292	1,014	589	764
	VP	362	270	235	298	314	328	226	291	270	261
	IP	58	46	68	85	166	46	35	127	71	97
	SPARK	1	0	3	1	0	4	5	0	4	0
	KW	17	13	14	22	43	13	8	31	18	22
TOTAL KW		200 KW	North		108 KW	South		92 KW			

Pacificorp - Naughton Station
T/R Voltages, Currents and KW's
Hourly Averages for : 12/07/2017

		TR1A	TR1AA	TR1B	TR1C	TR3AA	TR2A	TR2AA	TR2B	TR2C	TR3A
Hour	VS (KV)	32.9	32.4	27.9	29.9	31.5	30.3	27.9	30.5	28.1	31.4
20	IS (mA)	398	304	631	537	1,337	183	280	758	473	775
	VP	335	259	263	279	320	266	240	276	255	284
	IP	47	36	79	66	161	21	31	95	55	98
	SPARK	2	0	0	1	0	3	3	1	5	1
	KW	13	10	18	16	43	6	8	23	13	24
	TOTAL KW	175 KW		North	100	KW		South	75 KW		
	KW Total 3 Hour AVG	178	KW	North	100KW			South	78KW		
Hour	VS (KV)	31.6	33.6	27.9	30.6	31.7	30.1	29.0	30.8	28.8	31.7
21	IS (mA)	339	308	611	561	1,365	161	313	763	486	783
	VP	316	273	263	288	324	258	256	278	265	287
	IP	40	37	76	68	165	18	35	95	57	99
	SPARK	3	0	0	1	0	4	3	1	5	1
	KW	11	10	17	17	43	5	9	24	14	25
	TOTAL KW	174 KW		North	98	KW		South	76 KW		
Hour	VS (KV)	32.8	32.4	27.9	29.9	31.8	30.3	28.1	30.3	27.7	31.3
22	IS (mA)	382	291	604	537	1,350	175	283	722	439	743
	VP	333	256	261	279	324	264	240	272	250	282
	IP	45	35	75	65	163	20	31	90	51	93
	SPARK	3	0	0	1	0	3	3	1	5	1
	KW	13	10	17	16	43	5	8	22	12	23
	TOTAL KW	170 KW		North	98	KW		South	71 KW		
Hour	VS (KV)	31.9	33.6	27.9	30.7	31.9	30.6	29.1	30.9	28.6	31.7
23	IS (mA)	337	278	588	562	1,365	168	308	754	470	750
	VP	318	268	261	289	325	265	257	279	262	286
	IP	40	33	73	68	165	19	35	94	55	94
	SPARK	3	0	0	1	0	3	4	1	5	1
	KW	11	9	16	17	43	5	9	23	13	24
	TOTAL KW	171 KW		North	97	KW		South	75 KW		
	KW Total 3 Hour AVG	172	KW	North	98KW			South	74KW		

APPENDIX C: SITE OPERATOR LOG, WATER TRUCK LOGS, AND EMAIL CORRESPONDENCE

**DUST SUPPRESSION LOG
NAUGHTON POWER PLANT**
All Dust Suppression Related Activities Must be Logged

Date	Start Time	End Time	Operators Name (Print)	Material Hauled*	Number of Loads	Est. Amount per Load (gallons)	Area Watered / Comments
				W = Water Only; DC = Dust Control Chemical			<u>Indicate which FGD pond is sprayed</u> CP = Coal Pile; PLR = Plant Roads; SPDR = South Pond Roads; NPDR = North Pond Roads; NAP = North Ash Pond Apron; SAP = South Ash Pond Apron
5-13-17	1500	1545	Math Monow Mike Breese	W	2	3K	CP + PLR
5-25-17	1100	1500	Wayne Stubbs	W	4	3K	PLR
5-31-17	14:45	1500	Roger Laird	W	1	3K	PLR
6-5-17	0730	1500	W. Stubbs	W	5 1/2	3K	PLR
6-6-17	0730	1200	W. Stubbs	W	4 1/2	3K	PLR
6-7-17	1000	1430	"	DC	5	3K	SPDR, SAP, NPDR
6-8-17	0800	1400	"	"	5	3K	NPDR, NAP
6-10-17	13:35	15:20	Roger Laird	W	3	3K	PLR, NPDR, SPDR
6-12-17	13:30	15:00	Roger Laird	W	3	3K	PLR, NPDR, SPDR

*Fill Out Separate Lines for each Material Hauled



DUST SUPPRESSION LOG
NAUGHTON POWER PLANT
All Dust Suppression Related Activities Must

Date	Start Time	End Time	Operators Name (Print)	Material Hauled* W = Water Only; DC = Dust Control Chemical	Number of Loads
10-18-17	1500	1600	W. Stubbs	W	2
10-18-17	1600	1800	W. Stubbs	DC	2
10-19-17	0800	0830	"	DC	1
"	1300	1500	"	"	3
10/20/17	11:30	1500	Chance Burdett	W	4
10-21-17	1400	1500	W. Stubbs	W	3
10/22/17	1100	1600	R. Prodrick	W	4
10-24-17	1200			W	
10-25-17	1330	1400	W. Stubbs	W	1
10-30-17	1230	1330	"	"	1

*Fill Out Separate Lines for each Material Hauled

use	W DC	5
Breeze	W DC	6
air	W	1
Stubbs	W	1
Stubbs	W	2
Stubbs	W	1

DUST SUPPRESSION LOG
NAUGHTON POWER PLANT
All Dust Suppression Related Activities Must

Operators Name (Print)	Material Hauled* W = Water Only; DC = Dust Control Chemical	Number of Loads
Stubbs	W	2
Stubbs	W	2
1/7	W	1

Attachment A



DUST SUPPRESSION LOG NAUGHTON POWER PLANT All Dust Suppression Related Activities Must be Logged

Date	Start Time	End Time	Operators Name (Print)	Hauled* W = Water Only DC = Dust Chemical	Number of Loads	Est. Amount per Load (gallons)	Area Watered / Comments CP = Coal Pile; PLR = Plant Roads; PDR = Pond Roads NAP = North Ash Pond Apron; SAP = South Ash Pond Apron
11-1-17	1 Pm	6 Pm	Hydroseed truck William & Curtis	DC	2	4000	Sap
11-1-17	1 Pm	6 Pm	4000 gal water truck troy	DC	2	4000	Sap
11-2-17	1:30 Pm	6:30 Pm	Hydroseed truck William - Curtis	DC	2	4000	Sap
11-2-17	1:30 Pm	6:30 Pm	4000 gal water truck troy	DC	2	4000	Sap.
11-27-17	7:00 Am	5:00 Pm	4000 gal water truck mat	DC	6	4000	n.a.p.
11-27-17	7:00 Am	5:00 Pm	Hydroseed truck Billy	DC	6	4000	2 loads fGD pond 2 4 loads n.a.p.
11-28-17	6:30 Am	5:00 Pm	4000 gal water truck mat	DC	5	4000	fGD # 2.
11-28-17	6:30 Am	5:00 Pm	Hydroseed truck Billy	DC	5	4000	3 loads fGD # 2 2 loads fGD # 1
11-29-17	7:00 Am	11:00 Am	Hydroseed truck Billy & mat	DC DC	2	4000	2 loads fGD # 1

*Fill Out Separate Lines for each Material Hauled

When printed, this document is uncontrolled and for reference only



**DUST SUPPRESSION LOG
NAUGHTON POWER PLANT**
All Dust Suppression Related Activities Must be Logged

Date	Station	Time	End Time	Operators Name (Print)	Material Hauled* W = Water Only; DC = Dust Control Chemical	Number of Loads	Est. Amount per Load (gallons)	Area Watered / Comments Indicate which FGD pond is sprayed CP = Coal Pile; PLR = Plant Roads; SPDR = South Pond Roads; NPDR = North Pond Roads; NAP = North Ash Pond Apron; SAP = South Ash Pond Apron
10/31	10							
11/1	9							
11/1	10			M. Bruce	D, C & W	5	3k	North Ash Pond - Coal Pile South Ash Pond
11-2	11			M. Bruce	D, C & W	1	3k	South Ash Pond South Apron
11-24	11:00	13:00		Jesse Owens	W	4	3k	Coal Pile, South Ash Pond, South Apron
11-24	13:00	14:30		W. Stubbs	W	1	3k	NAPR
12-3	10:00	11:35		R. Laird	W	1	3k	CP, PLR, NAP
12-7	10:00	14:00		R. Laird	W	1	3k	CP, PLR
12-7	12:00	12:00		R. Laird	W	3	3k	PLR, CP, SPDR, NPDR
12-7	17:00	12:30		J. Owens	W	1 + a Partial	3k	NAP Got stuck w/ second load NAP
		16:00		J. Owens	W	3	3k	SAP, NAP SPDR, NAP, NPDR
		18:00		J. Owens	W	2	3k	SPDR, SAP

*Fill Out Separate Line

Attachment A



DUST SUPPRESSION LOG NAUGHTON POWER PLANT All Dust Suppression Related Activities Must be Logged

Date	Start Time	End Time	Operators Name (Print)	Hauled*	Number of Loads	Est. Amount per Load (gallons)	Area Watered / Comments
				W = Water Only DC = Dust Chemical			CP = Coal Pile; PLR = Plant Roads; PDR = Pond Roads NAP = North Ash Pond Apron; SAP = South Ash Pond Apron
11-29-17	7:00 AM	11:00 AM	4000 gal water truck NAP	DC	2	4000	FGD #1

*Fill Out Separate Lines for each Material Hauled

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Date	Sta
12-7-17	2
12-8-17	7

*Fill Out Separat



Atta
DUST SUPPR
NAUGHTON P
All Dust Suppression Relate

Date	Start Time	End Time	Operators Name (Print)	Hauled* W = Water Only DC = Dust Chemical
12/7/17	1:30			
12/7/17	1:30	5:00	Cool Erickson	W

ll Out Separate Lines for each Material Hauled

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Attachment A



DUST SUPPRESSION LOG NAUGHTON POWER PLANT

All Dust Suppression Related Activities Must be Logged

Dustbusters Inc.
Mag-Chloride Roads

2017

Date	Start Time	End Time	Operators Name (Print)	Hauled* W = Water Only DC = Dust Chemical	Number of Loads	Est. Amount per Load (gallons)	Area Watered / Comments CP = Coal Pile; PLR = Plant Roads; PDR = Pond Roads NAP = North Ash Pond Apron; SAP = South Ash Pond Apron
12/19	10:00		Dave Jones	DC	2	4800	South Ash Pond
12/19			Ian Redding	DC	1	4800	FGD 4
12/19			"	DC	0.5	4800	FGD 1
12/19			"	DC	0.5	4800	FGD 2
12/19			Ian Redding	DC	2	4800	North Ash Ponds
12/19		13:00	"		1	4800	Raw Water area

*Fill Out Separate Lines for each Material Hauled

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Rev: #5
Revised: 3/2016

Jason = (307) 828-4275
4365

Attachment A



DUST SUPPRESSION LOG NAUGHTON POWER PLANT All Dust Suppression Related Activities Must be Logged

Date	Start Time	End Time	Operators Name (Print)	Hauled* W = Water Only DC = Dust Chemical	Number of Loads	Est. Amount per Load (gallons)	Area Watered / Comments CP = Coal Pile; PLR = Plant Roads; PDR = Pond Roads NAP = North Ash Pond Apron; SAP = South Ash Pond Apron
12/14/17	0700	1600	Dustin Peay	DC	2	8K	NAP
12/15/17	0700	1730	Dustin Peay	DC	3	8K	NAP
12/14/17	1100	1800	RAY PRODDIT	2-DC 1-W	3	8K	NAP
12/17/17	1000	1400	Dustin Peay Jesse Owens	2.5W	2.5	20K	NAP, SAP
12/18/17	1000	1400	Dustin Peay	W	2	8K	NAP PDR
12/20/17	10:00	15:30	Chamse Burdess	W	2	8K	SAP
12/22/17	10:15	10:45	Chamse Burdess	W	1	4K	SAP
12/22/17	5:20	11:20	C. Burdess	W	1	8K	SAP
12-29-17	10:30	11:00	R. Laird	W	1	8K	CP, SAP, PDR

*Fill Out Separate Lines for each Material Hauled

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Power Plant

DUST SUPPRESSION LOG
NAUGHTON POWER PLANT
All Dust Suppression Related Activities Must be Logged

Date	Start Time	End Time	Operators Name (Print)	Material Hauled*	Number of Loads	Est. Amount per Load (gallons)	Area Watered / Comments
				W = Water Only; DC = Dust Control Chemical			<u>Indicate which FGD pond is sprayed</u> CP = Coal Pile; PLR = Plant Roads; SPDR = South Pond Roads; NPDR = North Pond Roads; NAP = North Ash Pond Apron; SAP = South Ash Pond Apron
10/31	10:00	—	M. Bruce	D, C & W	5	3K	North Ash Pond → Coal Pile South Ash Pond
11/1	9:00	—	M. Bruce	D, C & W	1	3K	South Ash Pond South Apron
11/1	10:30	13:00	Jesse Owens	W	4	3K	Coal Pile, South Ash Pond, South Apron
11-2	11:00	11:30	W. Stubbs	W	1	3K	NAPR
11-24	11:00	11:35	R. Laird	W	1	3K	CP, PLR, NAP

Attachment A



DUST SUPPRESSION LOG NAUGHTON POWER PLANT All Dust Suppression Related Activities Must be Logged

McMillen / Jacobs
Contractor

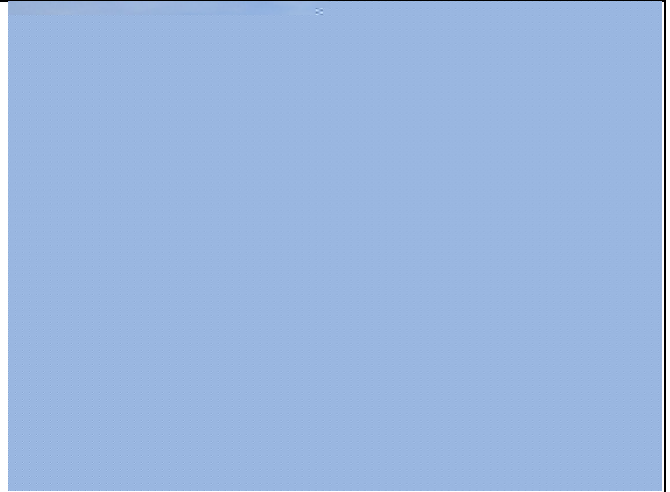
Date	Start Time	End Time	Operators Name (Print)	Hauled* W = Water Only DC = Dust Chemical	Number of Loads	Est. Amount per Load (gallons)	Area Watered / Comments CP = Coal Pile; PLR = Plant Roads; PDR = Pond Roads NAP = North Ash Pond Apron; SAP = South Ash Pond Apron
12/7/17	1:30	5:00	Carl E. Kesch	W	6	1500	NAP

*Fill Out Separate Lines for each Material Hauled

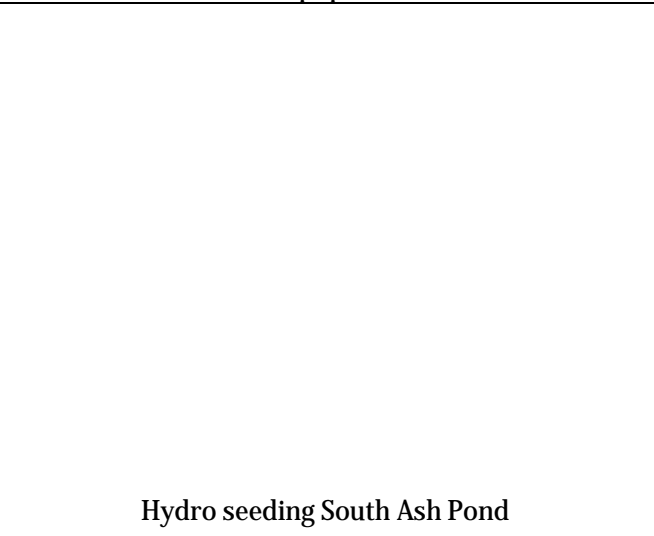
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Plant Dust Control Equipment North Ash Pond



Hydro seeding South Ash Pond



Hydro seeding South Ash Pond



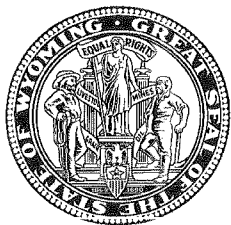
Hydro seeding North Ash Pond



Hydro seeding North Ash Pond



Hydro seeding North Ash Pond



Department of Environmental Quality

To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.



Matthew H. Mead, Governor

Todd Parfitt, Director

April 9, 2018

Certified Mail Receipt Number: 7017 1070 0000 7267 6894

Jason Murdock
PacifiCorp Naughton Power Plant
P.O. Box 191
Kemmerer, WY 83101

Re: Request for Flag under the Exceptional Event Rule for Naughton PM₁₀ December 7, 2017 Exceedance

Dear Mr. Murdock,

The Air Quality Division (AQD) has reviewed the additional information submitted by the PacifiCorp Naughton Power Plant (Naughton) to support their request to flag the December 7, 2017 PM₁₀ ambient monitored data as an Exceptional Event in accordance with 40 CFR Part 50.14. The AQD requested this additional information in a letter dated March 14, 2018 after a review of the original submittal and received the requested information from the facility on March 29, 2018. The review team of AQD staff found additional deficiencies in the March 29, 2018 submittal. Supplemental information is needed before the AQD can determine if all elements were addressed to exclude event-related concentrations from regulatory determinations.

The review team requests the following information to clarify the packet and satisfy the required criteria under the Exceptional Event Rule:

- To help satisfy the criteria in 40 CFR 50.14 (c) (3) (iv) (B), please submit a table containing hourly wind speed, wind direction, and PM₁₀ concentration data for the day of the exceedance. This item was requested in the AQD's March 14, 2018 letter, yet was not included in Naughton's March 29, 2018 submittal.
- Appendix A of the original demonstration package submitted on February 19, 2018 included CRO Log Book and Shift Log entries for December 7, 2017, as well as email correspondence surrounding the day of the exceedance. These items appear to have been excluded from the March 29, 2018 submittal. Please reinsert these items into the demonstration.

The AQD level of review for Exceptional Event packages is greatly dependent on the level of detail and information provided by the facility in the request to flag exceedances. The EPA has also provided examples of exceptional events demonstrations that meet the requirements of the draft guidance. The following link <https://www.epa.gov/air-quality-analysis/treatment-air-quality-data-influenced-exceptional-events> is the best place to find examples of information that are needed to have the EPA concur with an exceptional event demonstration.

Please keep in mind that while AQD has an extensive staff of monitoring, compliance and permitting personnel available to evaluate the documentation packet, this packet will also be reviewed by the public and the EPA.

Please submit the requested supplemental information through the Monitoring Module in IMPACT no later than two (2) weeks from receipt of this letter. Upon receipt, the AQD evaluation team will reconvene to determine if all requirements were met under the Exceptional Event Rule. If all requirements of the rule are met, the AQD will place flags in the AQS database and the Initial Notification and documentation package will be made available for public review and submitted to EPA Region 8 for concurrence. If you have any questions please contact me at (307) 777-7104 or daniel.sharon@wyo.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dan Sharon', with a stylized flourish at the end.

Daniel Sharon
Monitoring Project Manager

Cc: Naughton Monitoring File
Cara Keslar, Monitoring Section Supervisor

April 25, 2018

P.O. Box 191 * Kemmerer, Wyoming 83101

Cara Keslar, Monitoring Section Supervisor
Wyoming Dept. of Environmental Quality
Air Quality Division
200 West 17th Street
Cheyenne, WY 82002

**RE: PacifiCorp – Naughton Plant – Kemmerer, WY: Request of Flag under the Exceptional
Event Rule for PM-10 Exceedance – December 7, 2017**

Dear Ms. Keslar:

In response to the letter received from Mr. Daniel Sharon dated April 9, 2018, attached is an updated report with the additional information on the PM-10 exceedance that occurred on December 7, 2017. This report was prepared by Meteorological Solutions Inc. on behalf of PacifiCorp for the Naughton plant.

If you have any questions and/or need any additional information please contact Jason Murdock at (307) 828-4365.

Sincerely,



Rodger Holt
Plant Managing Director

EXCEPTIONAL EVENT DEMONSTRATION FOR EXCESSIVE PARTICULATE CONCENTRATIONS MEASURED AT PACIFICORP NAUGHTON'S MONITORING STATION

Prepared for:

Mr. Jason Murdock
PacifiCorp Naughton Power Plant
P.O. Box 191
Highway 189 South
Kemmerer, Wyoming 83101

By

Meteorological Solutions Inc.
Project No. 174501.0001

April 2018



EXECUTIVE SUMMARY

On December 7, 2017, ambient PM₁₀ concentrations measured at PacifiCorp Naughton's continuous ambient particulate monitoring station exceeded the 24-hour PM₁₀ National Ambient Air Quality Standard (NAAQS) and the Wyoming Ambient Air Quality Standard (WAAQS) of 150 µg/m³. There were no known breakdowns, operational events, or malfunctions at the Naughton Plant that would have led to PM₁₀ emissions from the plant to be excessively higher than normal. Therefore, the high PM₁₀ concentrations are believed to be caused by a natural high wind event.

The Naughton Power Plant has a fugitive dust compliance plan within the Plant Operations and Procedures Manual which provides procedures and guidelines for documenting and mitigating fugitive dust (Appendix A). Per the plan, dust suppressant chemical must be applied at least twice per year and three months apart as a preventative measure for fugitive dust emissions. Table 2-1 presents a tabulation of the chemical suppressant applications made in the second half of 2017. On December 18, 2017, the plant has started the process of hydro-seeding the ash ponds for dust control, dust prevention logs in Appendix C show that between December 18 and December 20, 2017, the South Ash Pond had received 109,800 gallons and 59,500 pounds and the North Ash Pond receiving of hydro-mulch.

The operations manual also requires a signal from the PM₁₀ monitoring station be provided to the control room for data and alarm purposes. The computer will initiate an alarm when the PM₁₀ value exceeds 150 µg/m³, based on an hourly average. Although the regulatory standard is based on a 24-hour average, the one-hour values trigger an alarm so that proper corrective action can be initiated in a timely manner so that PM₁₀ concentrations at the plant will not cause an exceedance of the 24-hour PM₁₀ NAAQS/WAAQS. On December 7, 2017, three water trucks were used to help control fugitive dust. Two of the water trucks (Pin Services and McMillen/Jacobs) were contractor trucks being used on-site for other construction projects, the third truck was the Naughton Plant water truck. A fourth water truck was on-site, however the air lines for the brake system had failed making the truck unsafe to operate. Plant records show that site operators acted in accordance with plant policies and procedures to curtail operations and control emissions demonstrating that the event was both not reasonably controllable and not reasonably preventable.

An instrumented 50-meter meteorological tower which is located adjacent to a continuous particulate matter (PM₁₀) Met One Beta Attenuation Mass (BAM) monitor is operated at the Naughton Power Plant. Meteorological data are collected by a data acquisition system (DAS) that uses one-second data values to compute and store 5-minute and hourly averages of temperature, delta-temperature, horizontal wind speed (scalar), wind direction (unit vector), sigma theta of wind direction, vertical wind speed, solar radiation, net radiation, and precipitation. Windroses for the month of December and the date of the exceedance, December 7, show a contrast of the wind patterns observed throughout the month verses and on the day of the event. On December 7, 2017, the winds were predominantly out of the west-northwest with 8 hours (about 29 percent) having wind speeds greater than 10 mps (22.4 mph). In comparison, only 8.7 percent of wind speeds were greater than 10 mps during the month of December, making December 7 windier than normal.

Two PM₁₀ emission sources are located upwind of the monitoring shelter when the wind is out of the west-northwest. They are the north ash pond (NAP) and the mine. Site operator and water truck logs, as well as photographs taken on December 7 show that plant operations were curtailed and that dust suppressant activities on the ash pond aprons and roads were implemented throughout the day of the high wind event.

1.0 INTRODUCTION

The PacifiCorp Naughton Power Plant operates an instrumented 50-meter meteorological tower and a continuous particulate matter (PM₁₀) Met One Beta Attenuation Mass (BAM) monitor. On December 7, 2017, the ambient PM₁₀ concentrations measured at the Naughton Power Plant monitoring station showed an exceedance of the 24-hour PM₁₀ National Ambient Air Quality Standards (NAAQS) and the Wyoming Ambient Air Quality Standards (WAAQS) of 150 micrograms per cubic meter (µg/m³). Information presented in this report is intended to substantiate the PM₁₀ data collected on December 7, 2017 and the exceedance of the 24-hour PM₁₀ NAAQS/WAAQS was due to a natural event and as such, data should be flagged as an exceptional event.

1.1. Exceptional Event Rule

Air quality data may be flagged to be excluded from regulatory decisions due to the nature of the event being exceptional. The definition of an exceptional event is defined in 40 CFR Part 50.1(j) as *an event(s) and its resulting emissions that affect air quality in such a way that there exists a clear causal relationship between the specific event(s) and the monitored exceedance(s) or violation(s), is not reasonably controllable or preventable, is an event(s) caused by human activity that is unlikely to recur at a particular location or a natural event(s), and is determined by the Administrator in accordance with 40 CFR 50.14 to be an exceptional event. It does not include air pollution relating to source noncompliance. Stagnation of air masses and meteorological inversions do not directly cause pollutant emissions and are not exceptional events. Meteorological events involving high temperatures or lack of precipitation (i.e., severe, extreme or exceptional drought) also do not directly cause pollutant emissions and are not considered exceptional events. However, conditions involving high temperatures or lack of precipitation may promote occurrences of particular types of exceptional events, such as wildfires or high wind events, which do directly cause emissions.*

A narrative to justify data exclusion is defined in the exceptional events rule as found in 40 CFR 50.14 and includes:

- (A) A narrative conceptual model that describes the event(s) causing the exceedance or violation and a discussion of how emissions from the event(s) led to the exceedance or violation at the affected monitor(s);
- (B) A demonstration that the event affected air quality in such a way that there exists a clear causal relationship between the specific event and the monitored exceedance or violation;
- (C) Analyses comparing the claimed event-influenced concentration(s) to concentrations at the same monitoring site at other times to support the requirement at paragraph (c)(3)(iv)(B) of this section. The Administrator shall not require a State to prove a specific percentile point in the distribution of data;
- (D) A demonstration that the event was both not reasonably controllable and not reasonably preventable; and,
- (E) A demonstration that the event was a human activity that is unlikely to recur at a particular location or was a natural event.

2.0 EVENT SUMMARY AND CONCEPTUAL MODEL

PacifiCorp owns and operates the Naughton Power Plant which consists of one 156 net MW (nominal), one 201 net MW (nominal), and one 280 net MW (nominal) coal-fired electric generating units designated as Units 1, 2, and 3, respectively. Unit 1 went into commercial operation in 1963, Unit 2 in 1968, and Unit 3 in 1971. The Naughton Power Plant is an existing major stationary source of air emissions under both the New Source Review and Title V programs. Unit 1 has a maximum boiler heat input rate of 1,850 MMBtu/hour, Unit 2 has a maximum boiler heat input rate of 2,400 MMBtu/hour and Unit 3 has a maximum boiler heat input rate of 3,700 MMBtu/hour.

Particulate matter (PM₁₀) emissions from Units #1 and #2 are controlled by electrostatic precipitators (ESPs) and flue gas conditioning systems. PM₁₀ emissions from Unit #3 are controlled by a pulse jet fabric filter baghouse. Particulate emissions from coal and fly ash handling facilities are controlled by baghouse and/or chemical and water dust suppression systems. Fugitive emissions from coals stockpiles and unpaved trafficked areas around the plant are controlled with water and chemical dust suppressants.

On December 7, 2017, the 24-hour PM₁₀ concentration measured by the BAM at the Naughton monitoring station for the day was 360.8 µg/m³, which exceeds the 24-hour PM₁₀ NAAQS and WAAQS of 150 µg/m³. The following sections present the plant operations, air quality, and weather data for December 7, 2017.

2.1. Plant Operations

The Naughton Power Plant has a fugitive dust compliance plan within the Plant Operations and Procedures Manual which provides procedures and guidelines for documenting and mitigating fugitive dust. Daily observations are made to ensure the facility is in compliance with all environmental regulations including visible emissions from the Ash Ponds, FGD Ponds, and Coal Pile. Appendix A provides a copy of the Fugitive Dust Control Plan and facility compliance documentation, logs, and data from the Unit 3 ESP on December 7, 2017. Figure 2.1 presents a plot of the Unit 3 ESP power consumption and number of in-service transformer rectifier sets on December 7, 2017.

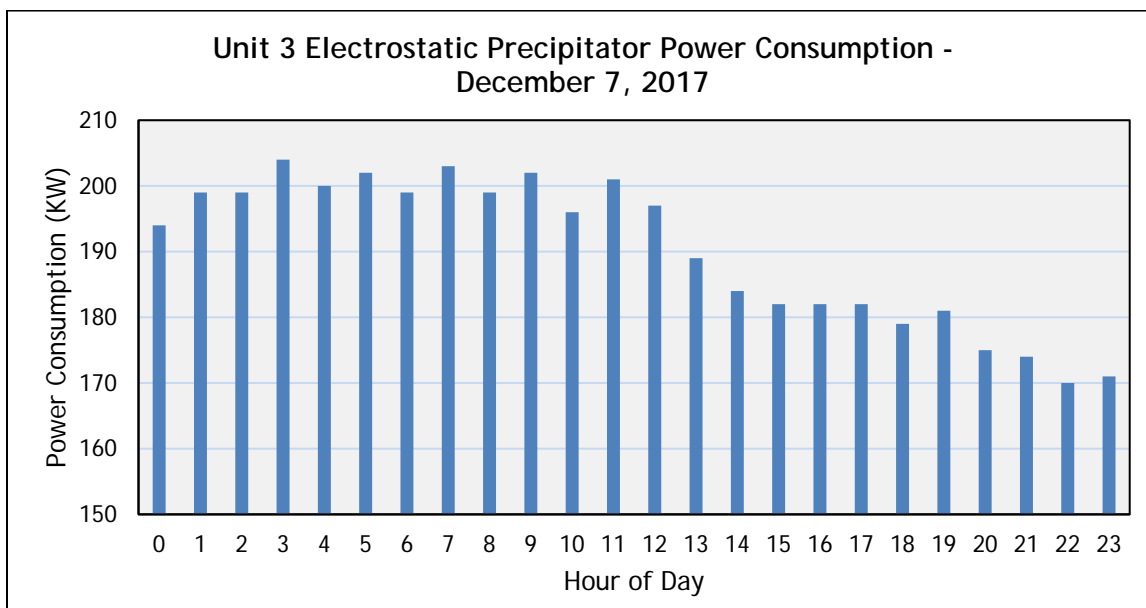


Figure 2.1 Unit 3 ESP Power Consumption

Per the plan, dust suppressant chemical must be applied at least twice per year and three months apart as a preventative measure for fugitive dust emissions. On December 7, 2017, three water trucks were used to help control fugitive dust. Two of the water trucks (Pin Services and McMillen/Jacobs) were contractor trucks being used on-site for other construction projects, the third truck was the Naughton Plant water truck. A fourth water truck was on-site, however the air lines for the brake system had failed making the truck unsafe to operate. Picture below in Figure 2.2 are two of the water trucks that were used on December 7th, the white truck is the plant's water truck and the red truck belongs to Pin Services. Table 2-1 presents a listing of the chemical suppressant applications by area and including the amount of chemical applied. Plant log entries, water truck logs, and email correspondence from plant personnel are provided in Appendix C, photographs of the dust suppressant activities are provided in Appendix D.



Figure 2.2 Water Trucks Employed by Naughton Plant on December 7, 2017

Two ponds, FGD ponds #1 and #2 are no longer active and are currently going through a close-out process that started in 2016. These ponds have been covered by soil and will undergo a seeding process in late 2018 or 2019 to finalize the retirement of the ponds. Chemical suppressant is applied to the soil to prevent and control windblown dust. On December 18, 2017, the plant has started the process of hydro-seeding the ash ponds for dust control, dust prevention logs in Appendix C show that between December 18 and December 20, 2017, the South Ash Pond had received 109,800 gallons and 59,500 pounds and the North Ash Pond receiving of hydro-mulch. Photographs of the hydro-mulch application are provided in Appendix D.

The fugitive dust plan also requires that a PM₁₀ signal from the monitoring station is provided to the control room for data and alarming purposes. The computer will initiate an alarm when the PM₁₀ value exceeds 150 µg/m³ on an hourly average. Although the regulatory standard is based on a 24-hour average, the one-hour values trigger an alarm so that proper corrective action can be initiated in a timely manner to prevent the 24-hour concentration exceeding the standard.

Table 2-1 Dust Chemical Suppressant Applications and Amounts

Area(s) Affected	Application Date(s)	Gallons of Chemical Suppressant Applied
SPDR, SAP, NPDR	06/07/2017	15,000
NPDR & NAP	06/08/2017	15,000
PLR	08/28-8/29/2017	33,000
FGD Pond 1	10/18/2017	6,000
FGD Pond 4 Road	10/19/2017	3,000
FGD Pond 2	10/19/2017	9,000
NAP, SAP, CP	10/31/2017	15,000
SAP	11/01/2017	3,000
SAP	11/01-11/02/2017	32,000
NAP	11/27/2017	40,000
FGD Pond 2	11/27-11/28/2017	40,000
FGD Pond 1	11/28-11/29/2017	24,000
SAP	12/07/2017	3,000
NAP	12/08/2017	12,000
NAP, NPDR	12/08/2017	15,000
SAP	12/12-12/13/2017	16,000
NAP	12/14-12/16/2017	60,000
SAP	12/19/2017	9,600
FGD Pond 4 Road	12/19/2017	4,800
FGD Pond 1	12/19/2017	2,400
FGD Pond 2	12/19/2017	2,400
NAP	12/19/2017	9,600
NAP – North Ash Pond Apron SPDR – South Pond Road NPDR – North Pond Road PLR – Plant Roads SAP – South Ash Pond Apron CP – Coal Pile		

Table 2-2 presents a chronological timeline of plant logs and water truck activities related to the particulate dust suppression at the Naughton Plant on December 7, 2017.

Table 2-2 Dust Suppression Activities on December 7, 2017

Affected Source	Start Time	End Time	Activity	Documentation
Coal pile	06:58	09:00	<ul style="list-style-type: none"> Stop work on pile Visual inspection did not show dust. 	Control Room Log Operation Shifter Log
Mine Ash ponds	10:00	--	<ul style="list-style-type: none"> Called mine to shut down. Deployed water truck to ash ponds 	Control Room Log Operation Shifter Log
NAP NPDR	10:35	12:30	<ul style="list-style-type: none"> Applied over 3000 gallons of water 	Water Truck Log
NAP NPDR SPDR	12:30	16:00	<ul style="list-style-type: none"> Applied over 9000 gallons of water 	Water Truck Log
NAP	13:30	17:00	<ul style="list-style-type: none"> Applied 9000 gallons of water 	Water Truck Log
SAP	14:30	18:30	<ul style="list-style-type: none"> Applied 3000 gallons of chemical suppressant 	Water Truck Log
Mine belt	16:00	--	<ul style="list-style-type: none"> Mine belt off Water truck watering 	Operation Shifter Log
SAP SPDR	17:00	18:00	<ul style="list-style-type: none"> Applied 6000 gallons of water 	Water Truck Log
NPDR SPDR	17:30	22:20	<ul style="list-style-type: none"> Applied 6000 gallons to NPDR Applied 6000 gallons to SPDR 	Water Truck Log
Mine belt	18:00	--	<ul style="list-style-type: none"> Mine belt off Water truck watering Note to keep watering as long as winds are high 	Control Room Log
Ash pond & Coal pile	18:30	--	<ul style="list-style-type: none"> Chemical suppressant being applied to ash pond Continue watering ponds 	Operation Shifter Log
Mine belt & Coal pile	20:00	--	<ul style="list-style-type: none"> All coal activity resumed 	Operation Shifter Log
Mine belt & Coal pile	21:00	--	<ul style="list-style-type: none"> Mine belt off Curtailed coal pile activity 	Control Room Log
NAP – North Ash Pond Apron NPDR – North Pond Road			SAP – South Ash Pond Apron SPDR – South Pond Road	

As can be seen from Table 2-2, site operators acted in accordance with plant policies and procedures to curtail operations and control emissions, and shows the PM₁₀ event was both not reasonably controllable and not reasonably preventable.









Naughton Plant – Dust Collector Method 22 Visible Emissions Form

Dust Collector or Baghouse	Fly Ash Loadout Silo	Mine Conveyor East Transfer Point (PEC)	Unit 1 / 2 Scrubber Lime Silo Baghouse
√ In Service		✓	
√ Out of Service	✓		✓
√ Hydro		N/A	N/A
OBSERVATIONS <ul style="list-style-type: none"> Indicate observer position relative to dust collector or baghouse exhaust: X Indicate location of the sun relative to the position of the observer: ● 			
Start Time hours/minutes/seconds		08:47	
End Time hours/minutes/seconds		08:49	
Observation Period Duration minutes/seconds		2	
Visible Emissions (Y/N)		N	
Emission Time Duration minutes/seconds		—	
Notification #		—	
Dust Collector Exhaust →	<input type="checkbox"/>	<input type="checkbox"/> X ●	<input type="checkbox"/>
Comments:			

- Completed visual observation forms are to be signed by on-duty Shift Supervisor or Plant Representative.
- The Shift Supervisor is to be notified of any visual emission observations, ASAP.
- Completed forms are to be delivered to Environmental Dept. for recordkeeping.

Shift Supervisor/ Plant Representative:

Date:

12-9-17

APPENDIX B: UNIT #3 ESP INFORMATION

Pacificorp - Naughton Station
T/R Voltages, Currents and KW's
Hourly Averages for : 12/07/2017

TR1A TR1AA TR1B TR1C TR3AA TR2A TR2AA TR2B TR2C TR3A

Hour	VS (KV)	35.2	32.4	25.7	30.6	31.1	33.8	26.4	31.0	29.1	29.6
0	IS (mA)	474	343	519	641	1,362	375	289	962	605	750
	VP	366	264	234	293	317	327	228	289	270	263
	IP	57	41	65	78	164	44	34	121	72	95
	SPARK	1	0	3	1	0	4	5	0	4	0
	KW	17	11	13	20	42	13	8	30	18	22
TOTAL KW		194 KW	North		104	KW	South		91 KW		

Hour	VS (KV)	34.8	33.6	26.1	31.1	31.3	33.5	27.3	31.2	30.4	29.4
1	IS (mA)	467	394	554	670	1,395	326	308	968	661	744
	VP	362	286	240	299	320	318	241	292	288	262
	IP	56	47	70	82	169	38	36	122	78	94
	SPARK	1	0	3	1	0	4	5	0	4	0
	KW	16	13	14	21	43	11	8	30	20	22
TOTAL KW		199 KW	North		108	KW	South		92 KW		

Hour	VS (KV)	34.8	32.4	25.4	30.9	31.0	34.8	26.1	31.0	29.4	29.1
2	IS (mA)	476	395	511	677	1,374	421	286	987	600	727
	VP	363	271	230	297	316	342	224	290	273	257
	IP	58	48	64	83	166	50	33	124	72	92
	SPARK	1	0	3	1	0	3	5	0	4	0
	KW	17	13	13	21	43	15	8	31	18	21
TOTAL KW		199 KW	North		107	KW	South		92 KW		

KW Total 3 Hour AVG 198 KW North 106KW South 91KW

Hour	VS (KV)	34.4	33.6	26.1	31.4	31.1	33.8	26.6	31.2	30.1	28.9
3	IS (mA)	469	429	567	713	1,395	376	310	1,020	649	729
	VP	358	290	241	304	316	327	235	292	285	256
	IP	57	52	71	88	168	44	37	128	77	92
	SPARK	1	0	4	1	0	4	5	0	4	0
	KW	16	14	15	22	43	13	8	32	20	21
TOTAL KW		204 KW	North		111	KW	South		93 KW		

Hour	VS (KV)	34.7	32.4	25.7	30.9	30.9	33.7	26.1	31.0	29.0	29.2
4	IS (mA)	477	386	541	694	1,380	387	292	1,014	589	764
	VP	362	270	235	298	314	328	226	291	270	261
	IP	58	46	68	85	166	46	35	127	71	97
	SPARK	1	0	3	1	0	4	5	0	4	0
	KW	17	13	14	22	43	13	8	31	18	22
TOTAL KW		200 KW	North		108	KW	South		92 KW		

Pacificorp - Naughton Station
T/R Voltages, Currents and KW's
Hourly Averages for : 12/07/2017

		TR1A	TR1AA	TR1B	TR1C	TR3AA	TR2A	TR2AA	TR2B	TR2C	TR3A
Hour	VS (KV)	33.6	33.6	25.4	31.1	30.8	32.4	26.7	31.2	29.6	29.4
5	IS (mA)	479	459	534	714	1,393	333	314	1,028	610	765
	VP	351	293	232	302	315	310	236	294	278	263
	IP	58	55	67	88	168	39	37	129	72	97
	SPARK	1	0	4	1	0	4	5	0	4	0
	KW	16	15	14	22	43	11	8	32	18	22
	TOTAL KW	202 KW		North	110	KW		South	92 KW		
	KW Total 3 Hour AVG	202	KW	North	110KW			South	92KW		
Hour	VS (KV)	33.8	32.4	25.4	30.7	30.7	33.1	26.2	30.9	28.4	29.6
6	IS (mA)	482	423	550	692	1,381	361	294	1,003	558	780
	VP	353	274	234	295	314	319	227	291	262	265
	IP	58	51	69	85	166	42	35	126	66	99
	SPARK	0	0	3	1	0	4	4	0	4	0
	KW	16	14	14	21	43	12	8	31	16	23
	TOTAL KW	199 KW		North	109	KW		South	90 KW		
Hour	VS (KV)	33.8	33.6	25.4	31.1	30.8	32.8	27.1	31.0	29.8	29.8
7	IS (mA)	481	451	544	707	1,395	334	321	1,003	625	787
	VP	353	293	234	301	316	313	240	292	281	267
	IP	58	54	68	87	168	39	38	126	74	100
	SPARK	1	0	4	1	0	4	5	0	4	0
	KW	16	15	14	22	43	11	9	31	19	23
	TOTAL KW	203 KW		North	110	KW		South	93 KW		
Hour	VS (KV)	34.1	32.4	25.4	30.5	31.1	33.7	26.5	31.0	28.6	30.1
8	IS (mA)	480	408	522	667	1,391	368	293	995	565	816
	VP	356	272	231	292	317	325	229	292	265	272
	IP	58	49	66	82	168	43	35	124	67	104
	SPARK	1	0	3	1	0	4	4	0	4	0
	KW	16	14	13	20	43	12	8	31	17	25
	TOTAL KW	199 KW		North	107	KW		South	92 KW		
	KW Total 3 Hour AVG	200	KW	North	108KW			South	92KW		
Hour	VS (KV)	33.9	33.6	25.7	30.6	30.9	32.6	27.3	31.1	29.4	30.4
9	IS (mA)	474	435	547	660	1,393	320	323	1,010	597	846
	VP	353	291	236	294	316	310	242	294	276	277
	IP	57	53	69	81	168	37	38	127	70	108
	SPARK	1	0	4	1	0	4	5	1	4	0
	KW	16	15	14	20	43	10	9	31	18	26
	TOTAL KW	202 KW		North	108	KW		South	94 KW		

Pacificorp - Naughton Station
T/R Voltages, Currents and KW's
Hourly Averages for : 12/07/2017

		TR1A	TR1AA	TR1B	TR1C	TR3AA	TR2A	TR2AA	TR2B	TR2C	TR3A
Hour	VS (KV)	33.8	32.4	25.7	29.9	31.0	32.9	26.6	30.9	28.2	30.3
10	IS (mA)	478	407	559	625	1,388	335	291	973	540	831
	VP	352	272	237	284	316	314	230	290	260	275
	IP	58	49	70	76	168	39	34	122	63	106
	SPARK	1	0	3	1	0	4	4	1	4	1
	KW	16	14	14	19	43	11	8	30	16	25
	TOTAL KW	196 KW		North	106	KW		South	90 KW		
Hour	VS (KV)	33.5	33.6	26.3	30.4	31.0	32.5	27.6	30.8	29.0	31.3
11	IS (mA)	471	427	611	639	1,393	307	319	945	560	901
	VP	349	290	246	291	316	307	245	288	272	287
	IP	57	51	77	78	168	36	37	119	66	115
	SPARK	1	0	2	1	0	4	5	1	5	1
	KW	16	14	16	19	43	10	9	29	16	28
	TOTAL KW	201 KW		North	109	KW		South	92 KW		
	KW Total 3 Hour AVG	200	KW	North	108KW			South	92 KW		
Hour	VS (KV)	33.6	32.4	27.3	29.8	31.3	31.5	27.2	30.9	27.8	31.9
12	IS (mA)	455	372	669	594	1,391	274	292	915	518	953
	VP	349	268	260	282	319	293	235	287	255	295
	IP	54	45	84	73	168	32	34	115	61	121
	SPARK	2	0	1	1	0	4	4	1	5	1
	KW	15	12	18	18	43	9	8	28	15	30
	TOTAL KW	197 KW		North	107	KW		South	90 KW		
Hour	VS (KV)	31.3	33.6	27.8	30.3	31.3	29.6	28.6	31.1	29.2	32.0
13	IS (mA)	349	347	649	580	1,386	177	318	871	580	925
	VP	315	279	263	287	320	259	253	288	274	295
	IP	41	41	81	71	167	20	36	109	68	117
	SPARK	3	0	0	1	0	3	4	1	5	1
	KW	11	12	18	18	43	5	9	27	17	30
	TOTAL KW	189 KW		North	101	KW		South	88 KW		
Hour	VS (KV)	33.4	32.4	27.9	29.7	31.4	30.3	27.7	30.6	27.9	31.8
14	IS (mA)	418	320	653	549	1,385	202	284	815	513	886
	VP	343	261	264	278	322	269	238	280	255	292
	IP	50	38	82	67	167	23	32	102	60	112
	SPARK	2	0	0	1	0	3	3	1	5	1
	KW	14	11	18	16	43	6	8	25	15	28
	TOTAL KW	184 KW		North	102	KW		South	82 KW		
	KW Total 3 Hour AVG	191	KW	North	104KW			South	87 KW		

Pacificorp - Naughton Station
T/R Voltages, Currents and KW's
Hourly Averages for : 12/07/2017

		TR1A	TR1AA	TR1B	TR1C	TR3AA	TR2A	TR2AA	TR2B	TR2C	TR3A
Hour	VS (KV)	31.7	33.6	27.9	30.4	31.5	29.8	28.7	30.8	28.9	32.1
15	IS (mA)	350	331	633	563	1,387	163	312	800	534	880
	VP	318	276	263	286	322	256	254	280	268	294
	IP	41	39	79	69	167	18	35	100	62	111
	SPARK	3	0	0	1	0	4	4	1	5	1
	KW	11	11	18	17	43	5	9	25	15	28
	TOTAL KW	182 KW		North	100	KW		South	82 KW		
Hour	VS (KV)	33.1	32.4	27.9	29.6	31.5	30.3	27.6	30.7	28.1	31.7
16	IS (mA)	417	327	645	534	1,372	201	282	804	511	845
	VP	339	262	264	276	321	269	237	280	257	289
	IP	50	39	81	65	165	23	32	101	60	107
	SPARK	2	0	0	1	0	4	3	1	5	1
	KW	14	11	18	16	43	6	8	25	15	27
	TOTAL KW	182 KW		North	102	KW		South	80 KW		
Hour	VS (KV)	31.8	33.6	27.9	30.2	31.5	30.1	28.6	30.9	29.0	32.0
17	IS (mA)	360	330	630	541	1,369	179	308	816	549	855
	VP	320	276	263	283	322	263	252	281	271	292
	IP	42	39	79	66	165	20	35	102	64	108
	SPARK	3	0	0	1	0	3	4	1	5	1
	KW	11	11	18	16	43	5	9	25	16	27
	TOTAL KW	182 KW		North	100	KW		South	83 KW		
	KW Total 3 Hour AVG	182		KW	North	101KW		South	82 KW		
Hour	VS (KV)	32.8	32.4	27.9	29.7	31.5	30.3	27.8	30.6	28.2	31.7
18	IS (mA)	401	311	633	522	1,355	199	279	794	510	821
	VP	335	260	263	276	322	269	238	279	258	288
	IP	48	37	79	64	163	23	32	99	59	104
	SPARK	2	0	0	1	0	4	3	1	5	1
	KW	13	10	18	16	43	6	8	24	15	26
	TOTAL KW	179 KW		North	100	KW		South	79 KW		
Hour	VS (KV)	32.1	33.6	27.9	30.5	31.5	30.1	28.8	30.6	29.1	31.9
19	IS (mA)	368	320	635	558	1,359	175	308	792	530	826
	VP	325	275	264	287	322	263	254	278	271	290
	IP	43	38	79	68	164	20	35	99	62	104
	SPARK	3	0	0	1	0	3	4	1	5	1
	KW	12	11	18	17	43	5	9	24	15	26
	TOTAL KW	181 KW		North	100	KW		South	80 KW		

Pacificorp - Naughton Station
T/R Voltages, Currents and KW's
Hourly Averages for : 12/07/2017

		TR1A	TR1AA	TR1B	TR1C	TR3AA	TR2A	TR2AA	TR2B	TR2C	TR3A
Hour	VS (KV)	32.9	32.4	27.9	29.9	31.5	30.3	27.9	30.5	28.1	31.4
20	IS (mA)	398	304	631	537	1,337	183	280	758	473	775
	VP	335	259	263	279	320	266	240	276	255	284
	IP	47	36	79	66	161	21	31	95	55	98
	SPARK	2	0	0	1	0	3	3	1	5	1
	KW	13	10	18	16	43	6	8	23	13	24
	TOTAL KW	175 KW		North	100	KW		South	75 KW		
	KW Total 3 Hour AVG	178	KW	North	100KW			South	78KW		
Hour	VS (KV)	31.6	33.6	27.9	30.6	31.7	30.1	29.0	30.8	28.8	31.7
21	IS (mA)	339	308	611	561	1,365	161	313	763	486	783
	VP	316	273	263	288	324	258	256	278	265	287
	IP	40	37	76	68	165	18	35	95	57	99
	SPARK	3	0	0	1	0	4	3	1	5	1
	KW	11	10	17	17	43	5	9	24	14	25
	TOTAL KW	174 KW		North	98	KW		South	76 KW		
Hour	VS (KV)	32.8	32.4	27.9	29.9	31.8	30.3	28.1	30.3	27.7	31.3
22	IS (mA)	382	291	604	537	1,350	175	283	722	439	743
	VP	333	256	261	279	324	264	240	272	250	282
	IP	45	35	75	65	163	20	31	90	51	93
	SPARK	3	0	0	1	0	3	3	1	5	1
	KW	13	10	17	16	43	5	8	22	12	23
	TOTAL KW	170 KW		North	98	KW		South	71 KW		
Hour	VS (KV)	31.9	33.6	27.9	30.7	31.9	30.6	29.1	30.9	28.6	31.7
23	IS (mA)	337	278	588	562	1,365	168	308	754	470	750
	VP	318	268	261	289	325	265	257	279	262	286
	IP	40	33	73	68	165	19	35	94	55	94
	SPARK	3	0	0	1	0	3	4	1	5	1
	KW	11	9	16	17	43	5	9	23	13	24
	TOTAL KW	171 KW		North	97	KW		South	75 KW		
	KW Total 3 Hour AVG	172	KW	North	98KW			South	74KW		

APPENDIX C: SITE OPERATOR LOG, WATER TRUCK LOGS, AND EMAIL
CORRESPONDENCE

		Operations Shifter's Log (for previous 24 hours)
		Thursday, December 07, 2017
Copeland	06:58	Pm 10 in alarm on honeywell stop work on coal pile
	07:00	Held Crew Meeting. Reminded crew about the road repairs.
	08:00	Had unit 3 operator wash down the coal dust from yesterday's coal leaks.
	08:30	1-2 cooling tower fan tripped called Elect.
	10:00	Called mine to shut down mine because of pm 10 high winds. Wind is now holding above 30 MPH. Water truck out on the ash pond for dust control.
	10:20	Elect. Repair 1-2 cooling tower fan. Bad fuse
	11:00	I&C Repaired unit 3 A absorber density meter.
	16:00	Pm 10 still in alarm. Running between 166 to 988 all day, mine belt off water truck watering all day, wind blowing 20 to 40 mph all day.
	Note	Keep the water trucks running tonight as long as the winds are still high and we can do it safely.
Larsen	18:30	Weeden on site to spray chemical on ash ponds, holding over EO to continue watering ash ponds, still curtailing coal pile activities
	19:00	Crew tailboard, discussed crew safety topic for December and cleaning area, reviewed job safety briefs
	20:00	PM 10 down, taking coal and resuming coal pile activities
	21:30	PM 10 back in alarm, curtailing coal deliveries and pile activity, water truck continuing to water ash ponds
	23:00	Air line broke on hydroveyor solenoid for U2 mechanicals, I&C will repair
	00:30	PM 10 back down again, resuming coal deliveries and pile activity as needed

Attachment A



DUST SUPPRESSION LOG NAUGHTON POWER PLANT

All Dust Suppression Related Activities Must be Logged

Dustbusters Inc.
Mag-Chloride Roads

2017

Date	Start Time	End Time	Operators Name (Print)	Hauled* W = Water Only DC = Dust Chemical	Number of Loads	Est. Amount per Load (gallons)	Area Watered / Comments CP = Coal Pile; PLR = Plant Roads; PDR = Pond Roads NAP = North Ash Pond Apron; SAP = South Ash Pond Apron
12/19	10:00		Dave Jones	DC	2	4800	South Ash Pond
12/19			Ian Redding	DC	1	4800	FGD 4
12/19			"	DC	0.5	4800	FGD 1
12/19			"	DC	0.5	4800	FGD 2
12/19			Ian Redding	DC	2	4800	North Ash Ponds
12/19		13:00	"		1	4800	Raw Water area

*Fill Out Separate Lines for each Material Hauled

When printed, this document is uncontrolled and for reference only

Rev: #5
Revised: 3/2016

Jason = (307) 828-4275
4365



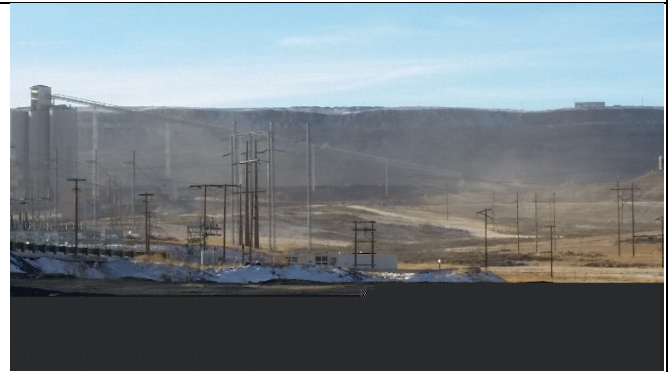
North Ash Pond



North Ash Pond



Dust from mine



Dust from mine

Applying dust control chemical to North Ash Pond

Rental Water Truck South Ash Pond



Plant Dust Control Equipment North Ash Pond



Hydro seeding South Ash Pond



Hydro seeding South Ash Pond



Hydro seeding North Ash Pond



Hydro seeding North Ash Pond



Hydro seeding North Ash Pond



Matthew H. Mead, Governor

Department of Environmental Quality

To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.



Todd Parfitt, Director

May 15, 2018

Jason Murdock
PacifiCorp Naughton Power Plant
P.O. Box 191
Kemmerer, WY 83101

Re: Request for Flag under the Exceptional Event Rule for Naughton PM₁₀ December 7, 2017 Exceedance

Dear Mr. Murdock,

On December 7, 2017, the PacifiCorp Naughton Power Plant's (Naughton) BAM recorded an exceedance of the 24-hour PM₁₀ standard, with a final average concentration of 360.8 µg/m³. On February 19, 2018 the Air Quality Division (AQD) received a request that data for the Naughton PM₁₀ monitor on this day be flagged under 40 CFR Part 50.14 "Treatment of Data Influenced by Exceptional Events" due to high winds.

After review of the submitted materials, the AQD has decided to pursue Naughton's request to flag the PM₁₀ data collected at the Naughton PM₁₀ monitor on December 7, 2017 under 40 CFR 50.14.

The next step in the process is a 30 day public comment period. In order to move forward, the AQD needs an electronic copy of all the documentation and correspondence submitted during the review process. All correspondence, starting with the original notification to the AQD, the final Exceptional Event packet, any requests for additional information, and other information submitted to the AQD during the review process should be combined into a single, chronologically ordered .pdf document and submitted to the AQD.

Once received, the chronological packet will be posted to the AQD's website and the public comment period will be advertised.

Naughton's final packet is requested on or before May 31, 2018. Please email it to daniel.sharon@wyo.gov or submit it through the IMPACT Monitoring module.

Please contact Daniel Sharon at (307) 777-7104 or daniel.sharon@wyo.gov if you have any questions regarding this matter.

Sincerely,

Cara Keslar
Monitoring Section Supervisor

Cc: Daniel Sharon, Monitoring Project Manager
Naughton Monitoring File
Greg Meeker, District 4 Engineer



Matthew H. Mead, Governor

Department of Environmental Quality

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Todd Parfitt, Director

May 15, 2018

Mr. Doug Benevento
Administrator, EPA Region 8
1595 Wynkoop St.
Denver, CO 80202

Re: Initial Notification of PM₁₀ Exceptional Event on December 7, 2017

Dear Mr. Benevento,

Attached is the initial notification of a high wind blowing dust exceptional event that occurred in Lincoln County on December 7, 2017 that led to an exceedance of the 24-hour PM₁₀ NAAQS at one (1) industrial monitor. The Wyoming Department of Environmental Quality – Air Quality Division (AQD) has evaluated the initial notification and circumstances surrounding the event and represents that it should be evaluated by Region 8 as a possible exceptional event.

The AQD is submitting an “Initial Notification of Potential Exceptional Event” and flagging the data in EPA’s Air Quality System (AQS) as per 40 CFR 50.14 (c) (2) (i) as a result of elevated PM₁₀ concentrations. The AQD would like to request that the Administrator determine this possible event meets the provisions of 40 CFR 50.14 (a) (1) (F) as a regulatory determination made on a case by case basis. The AQD considers this event to be of regulatory significance because of the AQD’s reliance on ambient data to determine compliance with the NAAQS at industrial facilities, and the use of ambient data in AQD’s permitting process. These reasons demonstrate the need to accurately portray anthropogenic versus non-anthropogenic or “exceptional” air quality issues to the public by means of excluding exceptional event concurred data from the data record.

In 1993 the AQD and EPA Region 8 signed a Memorandum of Agreement (MOA) to rely on ambient monitoring data at PRB coal mines to determine compliance with the 24-hour PM₁₀ NAAQS under AQD’s permitting process, rather than modeling potential 24-hour PM₁₀ impacts. In the decades since, the AQD has applied this same principal to other facilities across the state to demonstrate compliance with the 24-hour PM₁₀ NAAQS. The exceedance that the AQD is requesting Region 8 to review occurred at a power plant that has permit conditions requiring them to demonstrate compliance with the PM₁₀ NAAQS through the operation of this PM₁₀ monitoring station. The AQD reports this data to EPA Region 8 through EPA’s AQS database. Because the effectiveness of the AQD’s permitting and compliance programs is contingent on the lack of PM₁₀ NAAQS violations at required industrial monitoring stations, correctly reporting these data to EPA and AQS by placing exceptional event flags on these data is essential. The Region must take the appropriate steps to review and issue concurrence or non-concurrence on these data to accurately reflect the design value statistics in AQS and therefore accurately represent compliance with the NAAQS.

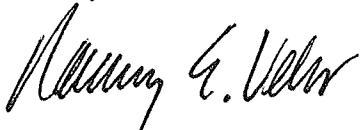
As mentioned above, the AQD relies on ambient industrial PM₁₀ data at facilities to determine compliance with the 24-hour NAAQS in the permitting process. It is critical that exceedances and violations of the NAAQS are properly characterized in the permit analysis as being anthropogenic or exceptional in nature. The AQD cannot issue a permit to a source that will cause or contribute to a violation of the NAAQS. For facilities that cannot model their potential permitting action, the AQD must rely on the ambient data record to prove compliance with the NAAQS. In order to rely on these monitoring data for permitting actions, Exceptional Events must be properly characterized in the data record and must be documented to EPA per 40 CFR 50.14.

It is also the AQD's stance that any exceedance caused by an exceptional event is significant and that it is important to demonstrate to the public the difference between exceedances that are anthropogenic versus those that are non-anthropogenic or exceptional in nature. Properly characterizing these exceedances in the public record and providing scientific evidence supporting the claim of exceptionality is essential to our shared role of serving the public. These data are used by the public, researchers, and other public agencies to make scientific, public health, and policy decisions. These data must be properly flagged and concurred with in the EPA's AQS in order for those data to be handled correctly. Without the critical step of determining concurrence, data is often misused by these entities to support decisions.

Due to the above mentioned factors, the AQD considers this exceedance to meet the criteria of regulatory significance and requests that the Administrator make a determination under 40 CFR 50.14 (a) (1) (F) that the EPA will agree to review an Exceptional Event demonstration for this event.

Please contact Cara Keslar, Monitoring Section Supervisor, with questions at 307-777-8684.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy E. Vehr".

Nancy E. Vehr
Administrator, Air Quality Division

Cc: Cara Keslar, AQD
Jason Murdock, PacifiCorp

EE Initial Notification Summary Information

PM₁₀ Template

Submitting Agency: Wyoming Department of Environmental Quality - Air Quality Division

Agency Contact: Daniel Sharon

Date Submitted:

Applicable NAAQS: 24-hour PM₁₀

Affected Regulatory Decision¹:

(for classification decisions, specify level of the classification with/without EE concurrence)

Area Name/Designation Status: Kemmerer, Wyoming/Attainment

Design Value Period (list three year period): 2014-2017

(where there are multiple relevant design value periods, summarize separately)

A) Information specific to each flagged monitor day that may be submitted to EPA in support of the affected regulatory decision listed above

Date of Event	Type of Event (high wind, volcano, wildfires/prescribed fire, other ²)	AQS Flag	Monitor AQS ID (and POC)	Monitor Name	Exceedance Concentration (with units)	Notes (e.g. event name, links to other events)
December 7, 2017	High Wind	RJ	56-023-0820	Naughton	360.8 ug/m3	December 7, 2017 High wind

B) Violating Monitors Information

(listing of all violating monitors in the planning area, regardless of operating agency, and regardless of whether or not they are impacted by EEs)

Monitor (AQS ID and POC)	Design Value (without EPA concurrence on any of the events listed in table A above)	Design Value (with EPA concurrence on all events listed in table A above)
56-023-0820 81102 2	0.3 Expected Number of Exceedances (ENE)	0.0 Average ENE

¹ designation, classification, attainment determination, attainment date extension, or finding of SIP inadequacy leading to SIP call

² Provide additional information for types of event described as "other"

C) Summary of Maximum Design Value (DV) Monitor Information (Effect of EPA Concurrence on Maximum Design Value Monitor Determination)
(Two highest values from Table B)

Maximum DV monitor (AQS ID and POC) <u>without</u> EPA concurrence on any of the events listed in table A above	Design Value 0.3 ENE	Design Value Monitor 56-023-0820	Comment Lone PSD monitor in network
Maximum DV monitor (AQS ID and POC) <u>with</u> EPA concurrence on all events listed in table A above	Design Value 0.0 ENE	Design Value Monitor 56-023-0820	Comment Lone PSD monitor in Network

D) List of any monitors (AQS ID and POC) within planning area with invalid design values (e.g. due to data incompleteness)

May 23, 2018

P.O. Box 191 * Kemmerer, Wyoming 83101

Cara Keslar, Monitoring Section Supervisor
Wyoming Dept. of Environmental Quality
Air Quality Division
200 West 17th Street
Cheyenne, WY 82002

**RE: PacifiCorp – Naughton Plant – Kemmerer, WY: Request of Flag under the Exceptional
Event Rule for PM-10 Exceedance – December 7, 2017**

Dear Ms. Keslar:

In response to the letter dated May 15, 2018, I am requesting that the final packet due date be changed from May 31, 2018 to June 7, 2018. The reason for this request, is that I will be out of town from May 23, 2018 to June 4, 2018 and will be unable to finalize the packet before I leave on May 23, 2018.

I can be contacted at (307) 828-4365 if you have any questions and/or need any additional information.

Sincerely,

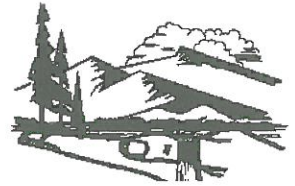


Jason Murdock
Plant Environmental Analysis



Department of Environmental Quality

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Matthew H. Mead, Governor

Todd Parfitt, Director

May 23, 2018

Jason Murdock
PacifiCorp Naughton Power Plant
P.O. Box 191
Kemmerer, WY 83101

Re: Request for Flag under the Exceptional Event Rule for Naughton PM₁₀ December 7, 2017 Exceedance

Dear Mr. Murdock,

The Air Quality Division (AQD) has received the May 23, 2018 request to extend the final Exceptional Event Packet due date for the PacifiCorp Naughton Power Plant (Naughton) December 7, 2017 PM₁₀ exceedance.

The AQD's May 15, 2018 letter set the due date for this document as May 31, 2018. Naughton is requesting to extend the due date to June 7, 2018. The AQD hereby accepts Naughton's deadline extension request.

Naughton's final packet is requested on or before June 7, 2018. Please email it to daniel.sharon@wyo.gov or submit it through the IMPACT Monitoring module.

Please contact Daniel Sharon at (307) 777-7104 or daniel.sharon@wyo.gov if you have any questions regarding this matter.

Sincerely,

Cara Keslar
Monitoring Section Supervisor

Cc: Daniel Sharon, Monitoring Project Manager
Naughton Monitoring File
Greg Meeker, District 4 Engineer